

Appendix P Draft EIS Public Comments and Responses

Federal Agency

Item Code	Item Name
F-001	U.S. Army Corps of Engineers
F-002	Department of Interior
F-003	EPA
F-004	Department of Interior 2
F-005	Ambassador of Latvia

Tribe

Item Code	Item Name
T-001	Muckleshoot Indian Tribe

State Agency

Item Code	Item Name
S-001	State of Washington Department of Archaeology & Historic Preservation
S-002	UW Dept of Scandinavian Studies
S-003	WSDOT
S-004	Ecology

Local Agency

Item Code	Item Name
L-001	Shoreline Fire Department
L-002	Alderwood Water & Wastewater District
L-003	City of Lake Forest Park
L-004	City of Lynnwood
L-005	City of Lynnwood2
L-006	City of Lynnwood3
L-007	City of Shoreline
L-008	Mountlake Terrace
L-009	Edmonds School District
L-010	City of Lynnwood 4
L-011	City of Seattle
L-012	Community Transit
L-013	Community Transit 2
L-014	King County
L-015	Puget Sound Regional Council

Business

Item Code	Item Name
B-001	Mayes Testing Engineers, Inc.
B-002	Mortgage Capital Associates
B-003	Cairn_Cross & Hempelmann
B-004	Cascade Trophy
B-005	JC Auto Restoration
B-006	Mullally Development Company
B-007	Simon Property Group
B-008	Raskin, Mike

Community Organization

Item Code	Item Name
C-001	Save Scriber Creek Park
C-002	American Latvian Association
C-003	Bellevue Sister Cities Association
C-004	Thornton Creek Alliance
C-005	Honorary Consul Republic of Estonia
C-006	Latvian Senior's Association
C-007	N King Co Mobility Coalition
C-008	futurewise
C-009	Lithuanian-American Community WA Chapter
C-010	Pilchuck Audubon Society
C-011	Ridgecrest Neighborhood Association
C-012	Latvian Ev. Luth Congreg of Seattle & Latvian Assoc of WA
C-013	Edmonton Latvian Society
C-014	West Coast Latvian Song Festival
C-015	Latvian Sorority Gundega
C-016	Mezotne Latvian Language Camp
C-017	185th Station Citizen Committee
C-018	Seashore Transportation Forum
C-019	World Federation of Free Latvians
C-020	Latvian Evangelical Lutheran Church Abroad
C-021	Seattle Congregation of the Estonian Ev. Lutheran Church
C-022	Seattle Estonian Society
C-023	Parkwood Neighborhood Association
C-024	145th-155th St Station Citizens Committee
C-025	The Latvian Museum
C-026	American Latvian Youth Association
C-027	Cascade Bicycle Club
C-028	Feet First
C-029	Fellowship of American Baltic Spouses
C-030	Latvian Association of WA
C-031	Lettonia WA Alumni Association
C-032	Northgate West Condominiums
C-033	Paramount Park Neighborhood Group
C-034	Seattle Latvian Lutheran Church
C-035	Sigulda
C-036	Walsh, Maryellen
C-037	Senior Services 1
C-038	Thornton Creek Legal Defense Fund
C-039	Transportation Choices
C-040	Seattle Latvian Community Center
C-041	Seattle Latvian School
C-042	Senior Services 2
C-043	Estonian American National Council Inc
C-044	Sound Cities Association
C-045	Friends of Jackson Park Trail
C-046	Thornton Creek Alliance TCA-2

Individual**Item Code****Item Name**

I-001	Anonymous 1
I-002	Balanda, Marco
I-003	Baltzell, Sumner
I-004	Bautista, Ariel
I-005	Bess, Samuel 1
I-006	Carlin, John
I-007	Chong, KC
I-008	Cooper
I-009	Davis, William Harley
I-010	Ervin, Kenneth
I-011	Foy, John 1
I-012	Guzman, Karina
I-013	Hanks, Jono
I-014	Harrison, Jeff
I-015	Hausauer, Robert
I-016	Hawkins, Barbara
I-017	Head, Kolleen
I-018	Heath, Ken
I-019	Hines, Carole
I-020	Unknown 1
I-021	Unknown 2
I-022	James, Robert
I-023	Janeway, Jeff
I-024	Jeremiah, Dale
I-025	Jodais, V
I-026	Kelly, Chris
I-027	Kit Ma, Chun
I-028	Lam, Celia
I-029	Lee, Marvin
I-030	Lepo, Charles
I-031	Levinsky, Laurie
I-032	Lo, Anthony
I-033	Mackeel, Cynthia
I-034	Martin-Rudnick, Diane
I-035	McCall, Timothy
I-036	Menchofer, Dale
I-037	Moore, Galinda
I-038	Morgan, Joshua
I-039	Nalis, Peter
I-040	Nikoiaidis, Jeffery
I-041	Pearson, Steve
I-042	Peterson, Dan
I-043	Pinner, Joanne
I-044	Rebstock, Ginger
I-045	Reed, Patricia
I-046	Reedy, Robert 1
I-047	Reikstins, Maija and Janis

I-048	Roberts, Curtis
I-049	Schatnitz, Greg
I-050	Schwantes, Glenn
I-051	Senter, Steve 1
I-052	Silang, Antonio
I-053	Smidchens, Alnis
I-054	Smidchens, Imants
I-055	Smith, Lynn
I-056	Sommers, Cassy
I-057	Sreibers, Peter
I-058	Starr, Cindy
I-059	Summer, Cathy 1
I-060	Trinh, Cuong
I-061	Vilgalys, Justas
I-062	Walgomott, Amy 1
I-063	Wall, Paul
I-064	Way-Rogainis, Marisa 1
I-065	Wells, Chris
I-066	Williams, Bruce
I-067	Abdella, Bill
I-068	Dale, Dan 1
I-069	Berlin, Don
I-070	Raisters, Eric 1
I-071	Sreibers, Gunars 1
I-072	Smidchems, Guntis
I-073	Harvey
I-074	Foy, John 2
I-075	Andrejevs, Markus
I-076	Reedy, Robert 2
I-078	Holmes, Jean
I-079	Holmes, John
I-082	Pedersen, Bill
I-083	Reay-Ellers, Andrew 1
I-084	Spires, Robert
I-085	Unknown, Dee Dee
I-086	Carr, Ron
I-087	Tennisey, Nancy
I-088	Unknown 3
I-089	Horner, Eileen
I-090	Hickey, William
I-091	Anderson, Carolyn
I-092	Anderson, W.R.
I-093	Andreasen, Adam
I-094	Anonymous 2
I-095	Anonymous 3
I-096	Anonymous 4
I-097	Anonymous 5
I-098	Apt, Mark and Arden
I-099	Baughman, Linda
I-100	Basil, Leslie

I-101	Bess, Samuel 2
I-102	Brierley, M
I-103	Bupp, Erick
I-104	Bupp, Kathleen
I-105	Circenis, Edvins 1
I-106	Clausen, Linden
I-107	Collins, Deirdre
I-108	Dailey, David
I-109	Dolan, Chuck 1
I-110	Donohue, Joanne
I-111	Egan, Kathryn
I-112	Gendreau, Stefanie
I-113	Gladstone, Judi
I-114	Griffith_Karen&Troy
I-115	Gubaekowski, Ann
I-116	Harris, Shanon
I-117	Hope, Shane 1
I-118	Johnson, Diana M
I-119	Johnson, Kristina
I-120	Kaplan, Cecily
I-121	Kelly, Chris 2
I-122	Kelly, Michael
I-123	Kelly, Teresa
I-124	Klinker, Cheryl
I-125	Knoke, Mark
I-126	Lancaster, Brad
I-127	Lo, Catherine
I-128	Martin-Vegue, Doug
I-129	Mearns, Josie
I-130	Mifflin, Ryan
I-131	Monroe, James
I-132	Murphy, Craig
I-133	Orr, Mike 1
I-134	Orr, Mike 2
I-135	Palms, Christopher
I-136	Petersons, Diana
I-137	Petersons, Modris
I-138	Petersons, Nikol 1
I-139	Petersons, Nikol 2
I-140	Piere, Ravin & Yurova, Polina
I-141	Raisters, Aldis
I-142	Raisters, Eric 3
I-143	Rauda, Vija
I-144	Ray, Wyvonne
I-145	Renes, Mike
I-146	Feuerborn, Sonja
I-147	Rhynard, Michael & Wen-Mei
I-148	Riekstins, Valdis
I-149	Riekstins, Valdis 2
I-150	Rihemis, John

I-151	Roberts, C.L.
I-152	Roberts, R.M.
I-153	Rozum, Pam and Ric
I-154	Sanchez, Mike
I-155	Scarpelli, Mike
I-156	Schneider, Roben
I-157	Scott, Ian
I-158	Sobarzo, Luis
I-159	Strom, Sigrid
I-160	Summer, Cathy 2
I-161	Thompson, Will
I-162	Tronsen, Kara
I-163	Turner, Janelle
I-164	Virsnieks, Andris
I-165	Virsnieks, Egils 1
I-166	Way-Rogainis, Marisa 2
I-167	Way-Rogainis, Marisa 3
I-168	Williamson, David C 1
I-169	Winnick, Ken
I-170	Wong, Miu Sam
I-171	Woolley, Beth
I-172	Zamelis, Andy
I-173	Zepeda, Barbara 1
I-174	Zommers, Karlis
I-175	Altman, Jeff
I-176	Howell, Gavin
I-177	Johnson, David
I-178	Kampen, Garry
I-179	Lockeman, George
I-180	Manderscheid, Michael
I-181	Ness, Dave
I-182	Ostrer, Allison
I-183	Phillips, Kyle
I-184	Summers, Karen
I-185	Unruh, Sharla
I-186	Weyer, Shelley
I-187	Willemarck, Linda 1
I-188	Zopfi, Melinda
I-189	Cameron, Michael 1
I-190	Circenis, Edvins 2
I-191	Faulds, Phoebe
I-192	Jacoby, Dan
I-193	Petersons, Lukas 1
I-194	Raisters, Eric 2
I-195	Ralston, Kenneth
I-196	Sreibers, Gunars 2
I-197	Wiest, Inte 1
I-198	Dolan, Chuck
I-199	Holmquist, Imants 1
I-200	Jaundalderis, Charlene

I-201	Kirsis, Lori
I-202	Orr, Michael 3
I-203	Petersons, Lukas 2
I-204	Petersons, Nikol
I-205	Raisters, Eric 4
I-206	Raisters, Inese 1
I-207	Screibers, Gunars 3
I-208	Upatts, Dzidra
I-209	Vetter, Sandra
I-210	Zepeda, Barbara 2
I-211	Bartholet, David 1
I-212	Escamilla, Derica 1
I-213	Escamilla, Derica 2
I-214	Goodman, Eric 1
I-215	Kinman, Karen 1
I-216	Lovitt, Douglas
I-217	Mayes, Mike
I-218	McDonald, Kevin
I-219	Monahan, Mary 1
I-220	Riekstins, Valdis 3
I-221	Shannon, Jeff
I-222	Shein, Gleb 1
I-223	Sreibers, Gunars 4
I-224	Walker, James
I-225	Walker, Janice
I-226	Walsh, Maryellen 1
I-227	Whittall, Corey
I-228	Willemarck, Linda 2
I-229	Williamson, David 2
I-230	Williamson, David 3
I-231	Bess, Samuel & Gwen
I-232	Cameron, Michael 2
I-233	Terence, Christopher
I-234	Farrand, Becky
I-235	King, Greg & Lauri
I-236	Lehman, Judy
I-237	Sismaet, Dennis
I-238	Spani, Martin
I-239	Unknown, David
I-240	Bates, Steven
I-241	Cho, Taetuk
I-242	Blombah, DL
I-243	Dougall, John
I-244	Engseth, Dianna
I-245	Fischbach, Max 1
I-246	Graube, Marita
I-247	Gustafson, Sharon
I-248	Jefferds, Liga & Peter 1
I-249	Ken, Kil You and Soon Ae Shin
I-250	Kim Lee Sun & Jong Dook

I-251	Lewtz, Eugene
I-252	Lull, Otis
I-253	Maculans, Andra
I-254	McClain, Kevin
I-255	Molnar, Lauren
I-256	Pade, Gerry
I-257	Pedecis, Dace
I-258	Plavins, Maris
I-259	Raisters, Inese 2
I-260	Rogainis, Andris
I-261	Russel, Jill
I-262	Schott, Marshall
I-263	Senter, Steve 2
I-264	Thompson, Jon
I-265	Victor, Robert
I-266	Walsh, Maryellen 2
I-267	Williams, Joel
I-268	Ziema, Ieva
I-269	Anderson, David
I-270	Abolins, Andrew
I-271	Fischbach, Max 2
I-272	Kirkpatrick, Dan
I-273	Klavins, Janis
I-274	Kukainis, Roberts
I-275	Lidacis, Mara
I-276	Musteikis, Danute
I-277	Schmidt, Corine
I-278	Abermanis, Rolands
I-279	Andrejevs Markus, Aldis
I-280	Andrejevs, Osha
I-281	Annas, Kathy
I-282	Apsitis, Mara
I-283	Banionis, Arunas
I-284	Birnbaums, Andrejs 1
I-285	Birnbaums, Andrejs 2
I-286	Blubaugh, Jonathan
I-287	Buck, Jonas
I-288	Cilnis, Juris
I-289	Copeland, Douglas&Silvija
I-290	Cotton, Ian
I-291	Dermanis, Paul
I-292	Drougas, Andrea
I-293	Gaigalaite, Ausra
I-294	Galins, Peteris
I-295	Gilkerson, Mona
I-296	Graus, Melita
I-297	Grendze, Karl
I-298	Haynes, Monica
I-299	Horner, Roger&Eileen
I-300	Jansevics, Janina

I-301	Jefferds, Peter&Liga 2
I-302	Johnson, Amy
I-303	Johnson, Steven
I-304	Kapa-Mauerman, Sylvia
I-305	Kulits, Zinta
I-306	Kusins, Daina
I-307	Leesment, Krista
I-308	Loeding, Danielle
I-309	Lorbergs, Aina Katrine
I-310	Lusis, Arnie
I-311	Matas, Saul
I-312	Miksys, Donna
I-313	Muehlenbachs, Lelde&Karlis
I-314	Ohaks, Ieva 1
I-315	Overby, Aleksa
I-316	Overby, Nathan
I-317	Basile, Ryan 1
I-318	Petersons, Angela
I-319	Beinikis, Linda
I-320	Beitlers, Juris & Grikis, Olga
I-321	Benson, Velta & Andris
I-322	Paegle, Sasha
I-323	Racenis, Marcis
I-324	Raize, Andrejs
I-325	Raize, Laima
I-326	Randa, Evan
I-327	Sankalis, Lilija
I-328	Schott, Laura
I-329	Sinclair, James & Barbara
I-330	Smith, Elaine
I-331	St. Hilaire, Ruth
I-332	Tierney, Caitlin
I-333	Totoraitis, Anne
I-334	Virsniers, Egils 2
I-335	Westfall, John
I-336	Young, Ieva & Donald
I-337	Ziema, Andris and Helena 1
I-338	Rauda, Eriks
I-339	Rekevics, Liz
I-340	Vitols, Jana
I-341	Anonymous 6
I-342	Stratins, Bruno
I-343	Jewell, Emily
I-344	Nelson, Wendy & Ken
I-345	Berkholtz, Karina
I-346	Harris, Ginny
I-347	Glover, Mary
I-348	Freimanis, Brianna
I-349	Landau, Henry
I-350	Maxwell, Matthew

I-351	Rice, Jerry & Carol
I-352	Poitras, Tom
I-353	Niedermeyer, Darcy
I-354	Johnson, Dagnija Valdmanis
I-355	Laigo, Renee
I-356	Iles, Tija
I-357	Rusis, Erik
I-358	Saheki, Yoshiko
I-359	Sandler, Julia Deak
I-360	Valle, Shane
I-361	Vetter, Sandi
I-362	Guthrie, Barbara
I-363	Onat, Astrida Blukis
I-364	Raisters, Eduard
I-365	Zommers, Dzintra
I-366	Kancs, Dina
I-367	Gill, Kathy et al
I-368	Wiest, Richard
I-369	Vitous, Rolf
I-370	Hanley, Monika
I-371	Anderson, Daira
I-372	Rusis, Maira
I-373	Reay-Ellers, Andrew
I-374	Zommers, Pauls
I-375	Paskovskis, Ed
I-376	Leitis, Edmunds
I-377	Monaghan, Mary 2
I-378	Holmquist, Imants
I-379	Sulcs, Aina
I-380	Blums, Martins
I-381	Bray, Ina
I-382	Cole, Willis
I-383	Valanciauskiewe, Ausra
I-384	Wiest, Inta 2
I-385	Willemarck, Linda 3
I-386	Willemarck, Linda 4
I-387	Willemarck, Linda 5
I-388	Ekmanis, Indra
I-389	Apsitis, Ilma
I-390	Ahlquist-Niemi, Jan
I-391	Andra, Allen
I-392	Anderson, Cheryl&Serila
I-393	Miksys, Rimas
I-394	Ikauniece, Ruta
I-395	Willemarck, Linda 6
I-396	Sulcs, Larisa
I-397	Vastaska, Ausra
I-398	Vastakas, Audrius
I-399	Basile, Ryan 2
I-400	Ziema, Andris & Helena 2

I-401	Razevska, Daidra
I-402	Floria, Tanya Nicole
I-403	Birnbaums, Vija
I-404	Teras, Mai
I-405	Kondrats, Sandis
I-406	Strautins, Bruno 2
I-407	Birnbaums, Daina
I-408	Cunha, Anne
I-409	DiPeso, Wendy
I-410	Forsyth, Terry
I-411	Hill, Viktorija
I-412	Iles, Anita
I-413	Lunde, Sarmite
I-414	Luters, Ints
I-415	Virsnieks, Imants
I-416	Hope, Shane 2
I-417	Dambrauskas, Daiva 1
I-418	Andvik, Nancy
I-419	Dambrauskas, Daiva 2
I-420	Dubman, Jonathan 1
I-421	Orrico, Geni
I-422	Breitlers, Didzis
I-423	Rauda, Gunars
I-424	Beland, Steve
I-425	MacKrell, Meghan
I-426	MacMurray, Armand
I-427	Shein, Gleb 2
I-428	Aboltina, Gundega
I-429	Anderson, Devv
I-430	Anonymous 7
I-431	Barrett, Dennis
I-432	Basile, Ryan 3
I-433	Berzin, Martin
I-434	Berzina, Sandra
I-435	Biteman, Jim
I-436	Brandon, Wes
I-437	Buck, Steve
I-438	Celms, Nancy
I-439	Celms, Sara
I-440	Chandler, Bridgett
I-441	Christopher, Michael
I-442	Dale, Dan 2
I-443	De Bonte, Austina
I-444	De Temmerman, Pieter
I-445	Dubman, Jonathan 2
I-446	Elder, Justin
I-447	Freet, Andra
I-448	Fulford-Foster, Jeremiah 1
I-449	Fulford-Foster, Jeremiah 2
I-450	Garzon, Roxanne

I-451	Goodman, Eric 2
I-452	Graffis, Bill
I-453	Grauds, Valdis
I-454	Heine, Julija
I-455	Ho, Joanne 1
I-456	Ho, Joanne 2
I-457	Janssen, Jeff
I-458	Johnson, Matthew
I-459	Kask, Linda
I-460	Kelertas, Violeta
I-461	Kenney, Pat
I-462	Key, Harold
I-463	Kinman, Karen 2
I-464	Knedlik, Will
I-465	Kulikauskas, Rima
I-466	Kulits, Paul
I-467	Luters, Katrina
I-468	Marcy, Tanya
I-469	Mohseni, Imants
I-470	Oborn, Roger
I-471	Ohaks, Ieva 2
I-472	Osvalds, Aivars
I-473	Pelekis, Jana
I-474	Petkus, Joseph
I-475	Phillips, Cynthia
I-476	Phillips, Sandy
I-477	Pittman, Kirk
I-478	Poitras, Liz
I-479	Priidik, Albert 1
I-480	Priidik, Albert 2
I-481	Pruzinskis, Andris
I-482	Pruzinskis, Krisjanis
I-483	Pukite, Brigita
I-484	Pukite, Ilze
I-486	Resnick, Douglas
I-487	Roberts, Sid
I-488	Rusis, Ed
I-489	Sankalis-Biteman, Ruta
I-490	Seglins, Andy
I-491	Shein, Gleb 3
I-492	Sils, Aleks
I-493	Sils, William
I-494	Stapars, Aija
I-495	Stephen, Zachary
I-496	Stinson, June
I-497	Stradling, Rebecca
I-498	Strickland, Scott
I-499	Stutman, TJ
I-500	Sulcs, John
I-501	Taht, Karl

I-502	Thomas, Martha
I-503	Tralmaks, Astrida
I-504	Walgamott, Amy 2
I-505	Walgamott, Andy
I-506	Willemarck, Linda 7
I-507	Willemarck, Linda 8
I-508	Willemarck, Linda 9
I-509	Willemarck, Linda 10
I-510	Zahn, Joe
I-511	Grant, Anna et. al.
I-512	Gray, Ingrida
I-513	Johnson, Mara
I-514	Pelekis, Janis
I-515	Pelekis, Mary
I-516	Pelekis, Vija
I-517	Petkus, Zita
I-518	Wilson, Tex & Ausma
I-519	York, Ruta
I-520	Monaghan, Tricia
I-521	Cutter, Jane
I-522	Everett, Karin
I-523	Harbaugh, David 2
I-524	Ho, Joanne 3
I-525	Norris, Jeanette
I-526	Raisters, Eriks 5
I-527	Sreibers, Gayle
I-528	Sreibers, Lara
I-529	Massaro, Frank
I-530	Willemarck, Linda 11
I-532	Andersen, Sherri
I-533	Anonymous 8
I-534	Anonymous 9
I-535	Bartholet, David 2
I-536	Boudrissa, Zohra
I-537	Buitenveld, David
I-539	Chism, Diana
I-540	Dale, Dan 3
I-541	Graudins, Ivars
I-542	Herauf, Dale
I-543	Jodais, Valdis
I-544	Johnson, Lara
I-545	Knoll, Mary
I-546	Macs, Dina
I-547	McFarlane, Madara
I-548	Moore, Carolyn
I-549	Ozolnieks, Indra
I-550	Petri, Janis
I-551	Petersons, Selga
I-552	Poukens, Oskars
I-553	Ilze, Pukite_2

I-554	Purs, Lilja
I-555	Randich, Lisa_Macs
I-556	Randich_Rachel
I-557	Seglins, Ilze
I-559	Williamson_David_C_2
I-560	Zommers, Juris
I-561	Zopfi_Melinda_2
I-562	Tochihara_Minda

From: Anderson, Suzanne NWS <Suzanne.L.Anderson@usace.army.mil>
Sent: Friday, July 19, 2013 8:51 AM
To: Swift, Lauren
Cc: Bennett, Matthew J NWS; Mcandrew, Rebecca E NWS
Subject: NWS-2011-964 Sound Transit (Lynnwood Link) (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Hi Lauren,

F-001-001 We received the box of documents related to the Sound Transit Lynnwood Link Extension project, including:

- Draft EIS
- Transportation Technical Report
- Ecosystems Technical Report
- Historic, Cultural, Archaeological Technical Report
- Noise and Vibration Technical Report

The transmittal cover letter indicated that the box included a copy of "*Executive Summary Lynnwood Link Extension Light Rail Project Draft EIS*", but I did not find that document.

I took a quick look through the Ecosystems Technical Report, and we have no comments at this time.

Since the wetland and stream assessments were conducted primarily at a reconnaissance level of effort, and compensatory mitigation is proposed only on a conceptual basis, we will expect submittal of a formal delineation report and mitigation plan concurrent with the JARPA submittal.

Please let me know if you have any questions.

Suzanne

Suzanne Anderson, PhD, PWS
Project Manager/Ecologist
Seattle District Regulatory Branch
U.S. Army Corps of Engineers CENWS-OD-RG
Mail Address: P.O. Box 3755
Seattle, WA 98124-3577
Building Location: 4735 East Marginal Way South
Seattle, WA 98134-3708

Phone: 206-764-3708
Fax: 206-764-6602

F-001-001

Thank you for your letter. The Executive Summary is a section of the bound Draft EIS. Thank you for your initial review of the Ecosystems report; several of the alternatives under consideration have wetlands impacts, and the Final EIS includes updated information on the wetlands in the area as well as design refinements that have been made since the Draft EIS. Potential mitigation measures have also been defined in more detail. A wetland delineation report and other materials will be provided as part of the project's Joint Aquatic Resources Permit Application.

Classification: UNCLASSIFIED
Caveats: NONE



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
620 SW Main Street, Suite 201
Portland, Oregon 97205-3026



9043.1
IN REPLY, REFER TO:
ER13/503

Electronically Filed

September 20, 2013

Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Swift:

F-002-001 The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Lynnwood Link Extension. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Allison O'Brien
Regional Environmental Officer

F-002-001

Thank you for your review. Sound Transit and FTA have continued coordination with the Department in concluding the project's Section 4(f) analysis in the Final EIS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

September 23, 2013

Mr. Dan Drais
Federal Transit Administration
915 Second Avenue, Suite 3142
Seattle, Washington 98174-1002

Mr. Perry Weinberg
Sound Transit
401 South Jackson Street
Seattle, Washington 98104-2826

Re: Lynnwood Link Extension Draft Environmental Impact Statement
EPA Region 10 Project Number: 11-4128-FTA.

Dear Mr. Drais and Mr. Weinberg:

The U.S. Environmental Protection Agency has reviewed the Lynnwood Link Extension Draft Environmental Impact Statement. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate this opportunity to participate in the NEPA process.

Sound Transit proposes to expand the regional light rail system north from Seattle to Lynnwood, Washington. The corridor is 8.5 miles long and generally follows I-5 from Northgate in King County to Lynnwood in Snohomish County. Six alternatives are evaluated in Segment A (Seattle to Shoreline); four alternatives in Segment B (Shoreline to Mountlake Terrace); and three alternatives in Segment C (Mountlake Terrace to Lynnwood). Because the Sound Transit Board of Directors will identify a preferred alternative based on information in the Final EIS, the Draft EIS does not identify a preferred alternative.

We commend FTA and Sound Transit for including an array of alternatives, which enable decision makers to avoid impacts to communities and the natural environment to a greater extent. We also appreciate your agencies' continued efforts to refine alternatives to further reduce impacts identified through the NEPA process.

F-003-001

Our overall rating for the Draft EIS is EC-2, Environmental Concerns, Insufficient Information. This is based on our concerns regarding specific alternative alignments within Segments B and C that would result in impacts to aquatic resources and Section 4(f) resources that are avoidable through the selection of other available alternatives. However, we rate most alternatives – specifically the alternatives within Segment A, and Alternatives B1, B4, and C3, as LO, lack of objections. An explanation of these ratings is enclosed for your use and information.

F-003-001

Thank you for your review and comment on the Draft EIS. The northern part of the Preferred Alternative analyzed in the Final EIS is a modification of the Alternative C3 that was discussed in the Draft EIS. Please see the Final EIS for the description of the Preferred Alternative and its potential effects. Sound Transit has provided responses to your specific comments in the following pages, but to summarize:

- a. On the need for a full 404(b)(1) analysis, of the alternatives, please see response to comment 3.
- b. On added discussion of Scriber Creek Park impacts, and potential impacts, please see our more detailed response to comment 7; however, the impacts to the park and surrounding wetland complex area for these alternatives were described in notable detail in the Draft EIS in sections 4.4. Social Impacts, 4.5, Visual and Aesthetics (including simulations of alternatives), 4.7 Noise and Vibration, 4.8 Ecosystem Resources, 4.17 Parks and Recreation, and 4.18 Section 4(f). Chapter 7 of the Final EIS describes the public comments received overall, and highlights the many comments opposing alternatives impacting the park and wetlands.
- c. The information on Scriber Creek Park has been updated in the Final EIS in Section 4.17 to also note the funding source of the park. Similar information on the other directly impacted park, Ridgcrest Park in Shoreline, has also been included, along with a description of Sound Transit's commitment to meet the requirements of the funding programs where conversion of parkland is involved.
- d. On ecological connectivity, please see response to comment 8.
- e. On additional detail for the wetlands and ecological impacts of the OMSF facility, Sound Transit has since issued a Draft EIS on that project

F-003-001

We recommend that the following information be provided in the final EIS:

- A 404(b)(1) analysis of alternatives, particularly for Segments B and C.
- More complete disclosure of impacts from Alternatives C1 and C2 to describe the effects from construction and operation of the light rail project within Scriber Creek Park and Wetland Complex. For example, consider the change in experience for park users and wildlife with noise and disturbance from passing trains every 4 minutes, the potential for disproportionate impacts to low income, minority, disabled, and transit dependent populations, and the nature of public comments on the alternatives.
- Identification and listing of land purchase funding sources for and any use restrictions applied (such as Native Growth Protection Areas) to parks and natural areas that would be affected by the proposed project, including but not necessarily limited to Scriber Creek, Scriber Creek Park, Scriber Creek wetland complex and associated natural upland areas and buffers.
- Effects on and potential to maintain or restore ecological connectivity in the project area.
- More specific information regarding the impacts that would cumulatively accrue to the natural area habitats, functions, and values, and the community open space and values of Scriber Creek Park and Scriber Creek wetland complex from the potential selection of the Lynnwood alternative for the Sound Transit Light Rail Operations and Maintenance Satellite Facility (OMSF).
- Cost projections that factor in the likely lower mitigation costs associated with Alternative C3 vs. C1 and C2.
- Information regarding the adequacy of parking to meet demand during and after project construction

Our detailed comments and recommendations regarding the proposed project are enclosed. We thank you for the opportunity to participate in the Lynnwood Link Extension project, and are grateful for the site visit, which provided valuable information and insights on the project alternatives. If you have questions or would like to discuss these comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Elaine Somers of my staff at (206) 553-2966 or by electronic mail at somers.elaine@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures

that incorporated the Lynnwood Project impact estimates, and Sound Transit is now completing a Final EIS for the OMSF; the Preferred Alternative for that project is a Bellevue site. The Lynnwood Link Extension Final EIS discussion in Section 4.8 Ecosystems incorporates the findings from the OMSF Draft EIS.

f. Please see response to comment 5.

g. Please see response to comment 13.

**U.S. Environmental Protection Agency
Detailed Comments on
Lynnwood Link Extension Draft EIS**

- F-003-002 Preferred Alternative Selection**
We have no objections or comments regarding the Segment A alternatives. However, there are a number of prominent issues that inform the selection of a preferred alternative in Segment C, and we discuss one with respect to Segment B. Among these are: impacts to ecosystem/aquatic resources, impacts to Section 4(f) resources, and community/environmental justice impacts. We discuss these aspects in their respective sections below:
- F-003-003 Aquatic Resources**
We appreciate that there are a range of alternatives for each project Segment, which affords the opportunity to avoid impacts to sensitive aquatic resources. The Draft EIS provides information that is usable for a 404(b)(1) analysis, such as the number of acres of wetlands, streams, and buffers that would be affected, but does not attempt to provide a complete 404(b)(1) analysis for the purposes of permitting under Section 404 of the Clean Water Act. The 404(b)(1) analysis would disclose information for the public and decision makers that is vital to selecting a preferred alternative.
- Recommendation:* Include a 404(b)(1) analysis in the Final EIS.
- F-003-004** In Segment C, based on direct and indirect impacts to aquatic resources we would identify Alternative C3 as the environmentally preferred alternative, with Option 1 in the I-5 median as preferred over Option 2 west of I-5. While Alternative C1 has a slightly smaller wetland impact (a difference of 0.1 acre), it would result in other significant and difficult to mitigate impacts, including impacts to Scriber Creek Park and Park users and numerous residential and commercial displacements. Alternative C2 would result in the most direct and indirect wetland impacts to the high value Category II Scriber Creek wetlands through direct habitat loss, fragmentation of the Scriber Creek Wetland Complex, and all associated effects to the plant, animal, and human community of park users.
- Recommendation:* In Segment C, we support Alternative C3 as the Preferred Alternative.
- F-003-005** The discussions regarding cost for the various Segment alignments (p. 5-13) do not appear to include the costs of environmental mitigation for unavoidable impacts, such as, wetland impacts.
- F-003-006** In Segment B, Alternatives B1 and B4 have fewer wetland impacts, less impervious surface and resulting water quality impacts, and less cut and fill. Based on these factors, we would expect that either Alternative B1 or B4 could qualify as the Least Environmentally Damaging Alternative for the purposes of 404 permitting.
- Recommendation:* In Segment B, to minimize impacts to aquatic resources we support Alternative B1 or B4 as the Preferred Alternative.
- F-003-007 Community Impacts, Environmental Justice**
We commend FTA and Sound Transit for integrating the discussion of transportation, property, land use, economics, visual and aesthetic resources, air quality, noise and vibration, parks and recreation

F-003-002

Sound Transit appreciates EPA's comments on the alternatives by segment, including EPA's description of impacts that are of concern.

F-003-003

The wetlands analyses in the Draft and Final EIS were based on conceptual engineering. They estimate impacts conservatively without attempting to judge the effectiveness of potential avoidance and minimization measures. Because they are primarily intended to help decision makers compare the impacts of the alternatives, they lack the detail required to support an actual permit application. While the Final EIS analysis is more refined than the Draft EIS, with some field delineations performed, the level of design information and agency coordination on potential avoidance measures that could be incorporated would make a Sec. 404(b)(1) analysis premature. The Final EIS acknowledges the alternatives analysis requirement and also identifies which alternatives would have lower levels of wetlands impacts. If appropriate for the Preferred Alternative, Sound Transit will prepare a 404(b)(1) analysis as part of project permitting, but also anticipates that the impacts for the Preferred Alternative would be below the levels requiring the analysis.

F-003-004

Thank you for identifying the Segment C alternative EPA finds as environmentally preferred. Sound Transit has identified a modified Alternative C3, with an alignment west of I-5, as part of the Preferred Alternative.

F-003-005

The cost estimates presented in Chapter 5 for the alternatives consider the need for environmental mitigation. The estimates apply a risk-based contingency amount because project design is still underway and

F-003-007 resources, and public services in the section on "Social impacts, Community facilities, and Neighborhoods" (p. 4-48). We believe this adds value to the analysis and discussion of impacts in the NEPA document (and recommend that it be done in future analyses).

For example, within the Segment C project area, there is a higher than average population of minority residents (37% vs. 32.7% average for King and Snohomish Counties) and, as stated in the Draft EIS (p. 4-51), the residents within the project corridor are generally less well off than residents in the two-county region. Household income is lower than the regional median (85% of the regional median) and 11.3% live at or below the federal poverty level. An estimated 4% of households are transit-dependent, but 3 neighborhoods (Pinehurst, South Lynnwood, and Lynnwood City Center) have more transit-dependent households (7 to 8%). As further evidence of economic condition, 46% are renter-occupied homes; 54% are owner-occupied.

Lynnwood is a heavily urbanized area with few parks and open spaces to serve a largely disadvantaged population. We believe these conditions should weigh heavily in the selection of a preferred alternative within Segment C. Clearly, Alternative C3 would avoid and minimize residential and business displacements (1 business displacement), and would avoid and minimize impacts to Scriber Creek Park (a Section 4(f) resource) and wetland complex, which, based on citizen response to the proposed alternatives since release of the Draft EIS, is much beloved and of disproportionately high value for the affected community. Our site visit to the Park and wetland complex on 9-16-13 revealed it to be an exceptionally high value wetland and natural area, despite its relatively small size. It clearly serves as a tranquil island amid widespread human development.

Recommendations: Provide information in the Final EIS to disclose and characterize the high ecological and community values of Scriber Creek Park and Wetland Complex. Avoid and minimize impacts to Scriber Creek Park and Wetland Complex and residential and business displacements. Alternative C3 is most effective in both respects.

F-003-008 **Ecological Connectivity**
We agree that long term impacts on ecosystem resources (p. 4-135) may include loss or degradation of terrestrial habitat, including habitat connectivity. The Draft EIS does not provide adequate information about habitat connectivity and the extent to which it exists in the project area and beyond. If there are habitat corridors that are currently providing function in this manner, they should be identified and those functions protected and maintained or potentially enhanced as part of the project, where possible.

Recommendation: Describe the Affected Environment, Environmental Consequences, and possible mitigation for impacts to ecological connectivity for the proposed project.

F-003-009 **Cumulative Effects**
The Draft EIS includes the proposed Lynnwood site for the Light Rail Operations and Maintenance Satellite Facility in the discussion of cumulative effects. This is helpful and appropriate, however, more specific information regarding the location, extent, and nature of the potential impacts from the OMSF should be provided. While a full analysis will occur in a subsequent EIS, it is not possible to determine whether the direct and/or indirect effects of the OMSF Lynnwood site would compromise the integrity of Scriber Creek Park and wetland complex.

specifics about the extent and cost of mitigation would be affected by a variety of factors and decisions that would be considered with more advanced design and permitting as the project progresses. Sound Transit understands that the cost of mitigation will vary depending on the alternatives chosen, but believes that the cost ranges used in the Draft EIS accurately convey the potential difference that mitigation could make for the project alternatives.

F-003-006

Thank you for identifying the Segment B alternative EPA finds as environmentally preferred. The Final EIS contains additional information on refinements that Sound Transit has made to Alternative B2 to help reduce some of the ecosystem and water resource effects noted in EPA's comments.

F-003-007

Chapter 7 of the Final EIS describes public comments on the alternatives, including the comments regarding the importance of Scriber Creek Park and the associated wetland complex.

Sound Transit notes EPA's recommendations for Alternative C3, which identified the ability to avoid the park impacts, minimize Scriber Creek wetlands impacts, and reduce other property impacts. The Sound Transit Board selected a modified Alternative C3 as the Preferred Alternative for this segment of the light rail facility, requesting further consideration of other factors that could improve the alternative, including preserving redevelopable lands, improving the connections to the transit center, and minimizing stream and wetland impacts. The importance of the Scriber Creek wetland complex was identified in Ecosystems Technical Report as well as the Ecosystems section the Draft EIS (Section 4.8), but is also discussed in Section 4.4 Social. The Final EIS provides updated discussion of the park and its associated wetlands for all alternatives, as

F-003-009 | *Recommendation:* In the Final EIS, provide more information regarding the potential effects of the OMSF Lynnwood site on the Scriber Creek Park and wetland complex.

F-003-010 | **Land Use Legal Restrictions**
The Draft EIS states that no parklands were purchased with Land and Water Conservation Funds, and therefore there are no Section 6(f) resources. However, the Draft EIS provides no information regarding the actual source of funding or authorization to designate the project area parks, particularly Scriber Creek Park. Because the Scriber Creek Wetland Complex has been retained thus far, the legal restrictions and requirements relevant to its protection should be fully identified and disclosed. For example, federal, state, and local protections should be discussed and upheld, including any potential Native Growth Protection Areas, mitigation actions, or other designations that may have been established pursuant to past development activities.

Recommendation: In the Final EIS, disclose the above legal requirements and restrictions that apply to Scriber Creek, Scriber Creek Park, and Scriber Creek Wetland Complex.

F-003-011 | **Project Cost and Mitigation**
The discussions regarding cost for the various Segment alignments (p. 5-13) do not appear to include the costs of environmental mitigation for unavoidable impacts, such as, wetland impacts. The Draft EIS indicates that Alternative C3 has the shortest guide way length and a slightly higher amount of property acquisition than C2. Because C2 would impact almost an acre of high value Category II wetlands (vs. 0.2 acre for C3), Alternative C2 mitigation costs would be higher than for C3.

Recommendation: Factor mitigation costs into any cost comparisons presented in the EIS.

F-003-012 | The Draft EIS states (p. 4-145) that temporary work bridges could be used in extremely sensitive areas, such as the Scriber Creek wetland complex. While extremely sensitive areas should be avoided, for any work that may directly or indirectly affect them, such measures should be applied as needed.

Recommendation: Incorporate Context Sensitive Design, Solutions, and construction practices where and whenever there are highly sensitive resources, and as a routine way of doing business.

F-003-013 | **Parking**
The Draft EIS indicates that the Lynnwood Park and Ride is currently at full capacity and that both on- and off-street parking are anticipated to be removed due to the placement of the light rail stations and other project modifications (p. 3-39). While further refinement of parking needs and provision may occur in future phases of the project (p. 3-40), to maximize ridership and availability of transit as a travel option, there needs to be adequate parking.

Recommendations: The amount of parking provided at each station should be further refined to ensure that supply would meet demand. We also encourage efforts to mitigate, i.e., provide some temporary parking, agreements with businesses to use underused lots, shuttle service, etc., the loss of available parking during construction that would affect the Lynnwood Park and Ride.

well as information about the Preferred Alternative with the modified Alternative C3.

F-003-008

The Final EIS provides more detail on habitat connectivity in Section 4.8.1, Affected Environment; Section 4.8.2, Long Term Impacts; and Section 4.8.3, Construction Impacts. Habitat connectivity will continue to be considered as part of the mitigation process for avoidance and minimization and included in selection of compensatory mitigation for ecosystem resources. Please note also that the Ecosystems Technical Report has more detailed discussions of connectivity and continuity issues, particularly for stream habitat.

F-003-009

At the time of the publication of this project's Draft EIS, design work and effects analysis for the Operations and Maintenance Satellite Facility (OMSF) project was still underway and details were not available for detailed discussion in this document. However, Sound Transit has augmented the discussion of OMSF cumulative effects in the Final EIS, and notes the higher level of potential effects to the Scriber Creek wetland complex if the Lynnwood Site for the OMSF project were developed. The OMSF Draft EIS was published on May 9, 2014.

F-003-010

Sound Transit has reviewed the funding sources used to develop directly impacted parklands and has included in the Final EIS a commitment to meet applicable park land or funding replacement requirements (Section 4.1 Acquisitions and Section 4.17 Parks and Recreation both have updated text). Section 4.8.2 and the Ecosystem Resources Technical Report of the Final EIS also have updated discussions of ecosystems impacts to the complex.

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

The large undeveloped parcel directly south of Scriber Creek Park is publicly held, but does not appear to have other protections or designations for those properties other than critical area ordinances and other existing federal, state, and local regulation for streams and wetlands. Additional reviews would be conducted for any property Sound Transit would use for construction and operation of the project, and Sound Transit would satisfy any applicable regulatory or legal requirements.

F-003-011

Please see the response to comment F-003-005.

F-003-012

Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on ecosystem mitigation is to avoid impacts on environmentally sensitive resources to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects. The Final EIS includes further measures to minimize impacts and describes mitigation in more detail. For Scriber Creek, Sound Transit's potential mitigation includes temporary work trestles, although final design and permitting would confirm the ultimate approach.

F-003-013

Section 3.2.7 of the Final EIS and Section 5.7 of the Transportation Technical Report includes additional discussion of parking at the Lynnwood station. Section 5.1 of the Transportation Technical Report discusses how ridership estimates reflect the ways riders are expected to access the station; many future riders are expected to take transit, walk or bike, in addition to choosing to park. Sound Transit has also considered options that would increase the parking supply at the

station. However, the provision of parking for transit centers is not made solely on estimates of unconstrained demand for parking, but must factor in local and regional plans and policies, the cost of additional parking, and environmental impacts. In Lynnwood, where the current park-and-ride is already a major hub for transit transfers, Sound Transit anticipates that transit transfers at the station as well as walking and biking will continue to increase in popularity, in keeping with the higher-density developments that Lynnwood anticipates near the station. Finally, Sound Transit identifies mitigation measures to address potential spillover parking that could occur.



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
620 SW Main Street, Suite 201
Portland, Oregon 97205-3026



9043.1
IN REPLY REFER TO:
ER13/503

Electronically Filed

September 27, 2013

Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Swift:

On September 20, 2013, the U.S. Department of the Interior (Department) submitted a letter to you stating that we had no comments to offer regarding the Draft Environmental Impact Statement (DEIS) for the Lynnwood Link Project. Although the comment period for the DEIS has ended, the Department respectfully submits the following comments focused on the Section 6(f) evaluation for the project.

F-004-001 Section 4.18.3 of the DEIS is incorrect in stating that there are no Land and Water Conservation Fund (LWCF) properties within the Project area. There are two LWCF protected parks within the Project area: Twin Ponds in Shoreline (53-00082) and Jack Long in Montlake Terrace (53-00072).

Furthermore, under Alternative A5, Sound Transit has identified that parking at Twin Ponds may be used for light rail purposes. The National Park Service, a component bureau of the Department, would consider this a conversion of recreation use to transportation use, and such a conversion has not been correctly identified in the accompanying Section 6(f) analysis as constituting an impact.

Thank you for the opportunity to review this document. For additional information or assistance with addressing these points in preparing the Final EIS, please contact Ms. Heather Ramsay, Program Officer, State & Local Assistance Programs, Pacific West Region, 909 First Avenue, Seattle, WA 98104 (206) 220-4123. If you have any other questions, please contact me at (503) 326-2489.

Sincerely,

Allison O'Brien
Regional Environmental Officer

F-004-001

Thank you for the additional information on LWCF-funded resources in the project vicinity. Sound Transit has conducted additional reviews of the funding sources used to develop parklands and has included this information in the Final EIS. Sound Transit has also defined measures to avoid the potential for transit-related parking at Twin Ponds Park. Parking for transit purposes is not proposed at the park and signage restricting time periods would be an effective means of preventing unauthorized parking at the park. The project's Preferred Alternative does not include a station at NE 155th Street, which also avoids the potential for such impacts to the park.



AMBASSADOR OF THE REPUBLIC OF LATVIA
2306 MASSACHUSETTS AVENUE, NW, WASHINGTON, DC 20008, USA

Washington D.C.
September 20, 2013
No. 22.1.-912

Sound Transit
Comments c/o Lauren Swift
401 Jackson St.
Seattle, WA 98104

Dear Sir/Madam,

As the Ambassador of the Republic of Latvia to the United States I have been approached by the World Federation of Free Latvians, the American Latvian Association in the United States and the Latvian Community in Seattle regarding the next extension of the Sound Transit system in the Seattle area that might negatively affect the Latvian church and Community Center house in the city, possibly leading to the destruction of the Center.

The Latvian community in Seattle is among the largest and most active Latvian communities in the United States. Their Community Center house possesses an impressive cultural and historic heritage for Latvians living in the US. It would be of great loss to the very vibrant and exceptionally warm US-Latvian relations as well to see that the building might perish because of the extension of the Lynwood Link railway line.

I would like to hope that an alternate solution can be found and this particular property will remain unaffected.

Please give this matter your closest attention.

Yours Sincerely,

Andris Razāns
Ambassador of Latvia in the US



F-005-001

Sound Transit and the Federal Transit Administration appreciate the letter describing your concerns about the potential displacement of the Latvian Evangelical Lutheran Church under the Draft EIS Alternatives A1, 5, and 10 of Sound Transit's Lynnwood Link Extension. Since the publication of the Draft EIS, Sound Transit performed additional engineering that eliminates the need to displace the Latvian Evangelical Lutheran Church. Chapter 2, Alternatives, in the Final EIS describes the refinements, and Section 4.1 describes the acquisition impacts. In addition, compensation would be provided to the church where minor acquisitions of land from the church property would be needed, as required by the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

F-005-001

From: Karen Walter <KWalter@muckleshoot.nsn.us>
Sent: Monday, September 23, 2013 12:56 PM
To: Lynnwood Link DEIS
Subject: Lynnwood Link Extension DEIS

Lauren and Dan,
We have reviewed the Draft EIS and the associated appendices for the proposed Lynnwood Link Extension project proposed by Sound Transit and the Federal Transit Administration. In general, it appears that many of our previous comments on the Ecosystem Section analyses have been incorporated into the DEIS and the Ecosystems Technical Report.

We do have a couple of comments on these documents as noted below:

- T-001-001** | 1. It appears that Alternative C1 would have the fewest impacts upon Scriber Creek, a Swamp Creek tributary, associated wetlands and its associated floodplain based on the information in the DEIS. As a result, this sub-alternative would likely have the fewest impacts to salmon and their habitat and would be preferred.
- T-001-002** | 2. In Section 4.8.2, Cumulative Impacts, there is a sentence indicating that Sound Transit would work with WSDOT to coordinate any design work that may impact WSDOT/WDFW culvert replacement projects. Please note that these state-owned culverts are likely subject to the recent Federal Court decisions regarding state-owned culverts and at a minimum would need to also include the Muckleshoot Indian Tribe Fisheries Division on these coordination discussions and design considerations.
- T-001-003** | 3. As there are some unavoidable impacts to streams, floodplains, wetlands and buffers, we request the opportunity to work closely with Sound Transit and FTA as the project undergoes further design and mitigation plan development.
- T-001-004** | 4. For any pollution generated surfaces that require stormwater water quality treatment methods, we recommend that enhanced treatment methods be used to maximize the removal of heavy metals and oils from stormwater that may otherwise adversely affect salmon in the receiving water bodies.

We appreciate the opportunity to review this proposal. Please let me know if you have any questions.

Thank you,
Karen Walter
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division Habitat Program
39015 172nd Ave SE
Auburn, WA 98092
253-876-3116

T-001-001

Thank you for your comment stating a preference for Alternative C1 and the reasons for your preference.

T-001-002

Sound Transit will coordinate with the Muckleshoot Indian Tribe Fisheries Division regarding final design work that may impact WSDOT/WDFW culvert replacement projects.

T-001-003

Sound Transit will coordinate with the Muckleshoot Indian Tribe Fisheries Division during final design, and the tribe will be invited to participate in the permitting process.

T-001-004

All Sound Transit projects must mitigate any unavoidable impacts to ensure that they do not reduce ecosystem function or acreage. (See Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit [2007]). In addition, all Sound Transit projects must consider low-impact development (LID) methods, which often include technologies that maximize the removal of heavy metals and oils from stormwater, as a first choice for stormwater treatment. The Lynnwood Link Extension design team will review the feasibility of LID strategies as the Preferred Alternative design advances and, if necessary, will use other methods to protect water quality.



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

August 12, 2013

DB - original
JW

Mr. Kenneth Feldman
Deputy Regional Administrator
Federal Transit Administration
915 Second Ave., Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:

Log: 100611-07-FTA

Property: Sound Transit's Lynnwood Link Extension Light Rail Project

Re: Receipt of Draft Environmental Impact Statement, No Adverse Effect

Dear Mr. Feldman:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The Lynnwood Link Extension Light Rail project has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

S-001-001

Thank you for submitting the draft Environmental Impact Statement Summary. We have reviewed the document and concur with your preliminary finding that the project, as described, will have no adverse effect on historic properties and/or archaeological sites within the area of potential effects identified for the project.

If additional information on the project becomes available, construction plans are altered, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov

NOV 15 2013 11:57

State of Washington • Department of Archaeology & Historic Preservation
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065
www.dahp.wa.gov



S-001-001

Thank you for your letter. Sound Transit has appreciated the collaborative communication and coordination with DAHP during the Lynnwood Link Extension EIS and Section 106 reviews.

September 10, 2013

Sound Transit
Draft EIS Comments, c/o Lauren Swift
401 S. Jackson St., Seattle, WA 98104

To the Sound Transit Board:

S-002-001

We are writing to express our concern for the future of the Latvian Community Center, located at 17710 - 3rd Avenue Northeast. As you know, the Center's activities will be affected by the light rail extension that is planned along Interstate 5.

The University of Washington's Department of Scandinavian Studies maintains close ties to Seattle's Latvian, Estonian, and Lithuanian communities, who all organize many events at the Latvian Center. Students and instructors in UW's international studies programs attend concerts, lectures, films, and theater performances, to learn about these countries and their people. Student tickets and parking are inexpensive (much cheaper than flying to the countries!), because the Center is owned by the Latvian community. The Scandinavian Department's Baltic Studies Program is the only program in the United States to teach Estonian, Latvian, and Lithuanian, three languages that are often spoken at Latvian Center events where UW's foreign language students can practice their language skills.

The UW Scandinavian Department also organizes events at the Latvian Center. The Center's central location, parking lot, and kitchen facilities make it an ideal place for community outreach activities such as our annual "Baltic Saint Martin's Day" celebration, lectures, and other events that UW co-hosts with community organizations.

For the next few years, construction of the light rail line will disrupt these educational events for our students and faculty, as well as UW community outreach opportunities at the Latvian Center. We hope that when construction is finished, the Latvian Center will be able to continue hosting the vibrant cultural life that enriches the education of our students and teachers and off-campus communities.

We hope that representatives of Sound Transit will be able to attend the UW Baltic Program's "Martin's Day" celebration on October 26, 2013, to see for themselves that the Latvian Center is an incredible gift to the Seattle community. We hope that Sound Transit will take every possible step to ensure that the Center can continue its activities during and after light rail construction.

Please contact the Department of Scandinavian Studies if further information is needed.

Sincerely,


Jan Sjavik, Chair


Guntis Smidchens, Associate Professor

UW Department of Scandinavian Studies, 206-543-0645; uwscand@uw.edu

318 Raitt Hall Box 353420 Seattle, WA 98195-3420

#06.543.0645 fax 206.685.9173 uwscand@uw.edu <https://scandinavian.washington.edu/>

S-002-001

Thank you for describing the linkage between the University of Washington's Department of Scandinavian Studies and the Seattle Latvian Evangelical Lutheran Church. Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall.

Although construction activities will be adjacent to the church, Sound Transit will work closely with the church to maintain access, minimize parking loss, and reduce other potential construction disruptions to ongoing church and center activities. The primary construction in the area would be ongoing for 1-2 years in the area, but major construction activities would be shorter duration. For temporary impacts such as truck traffic, detours, noise, dust, light and glare, Sound Transit proposes best management practices to avoid and minimize impacts in Sections 3.6, 4.5.7, 4.6.7, and 4.7.7. The construction area would also be fenced to protect public safety, and the church would have a direct contact at Sound Transit to discuss any issues of concern.



**Washington State
Department of Transportation**

Lynn Peterson
Secretary of Transportation
September 23, 2013

Northwest Region
15700 Dayton Avenue North
P.O. Box 330310
Seattle, WA 98133-9710
206-440-4000
TTY: 1-800-833-6388
www.wsdot.wa.gov

Joni Earl
Sound Transit
Union Station
401 S. Jackson Street
Seattle, WA 98104-2826

Dear Joni:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Lynnwood Link Extension we received on July 18, 2013. The Washington State Department of Transportation (WSDOT) strongly supports the extension of light rail to Lynnwood. As we work with our partners to develop an integrated transportation system for the 21st century, it is important to provide multiple mode choices to people trying to reach destinations in congested travel corridors like Interstate 5 (I-5). The Lynnwood Link Extension project will add much-needed capacity for moving people in the I-5 corridor and ultimately allow the entire transportation system to function better.

WSDOT has been working closely with Sound Transit on the development of the light rail extension to Lynnwood. As a result of our close coordination, we consider all of the alternatives being evaluated for this project to be viable choices and do not have a preference. We look forward to continuing to collaborate with Sound Transit on the design of the project after a Preferred Alternative is identified.

As we work together during final design, WSDOT will be focused on maintaining safety and also on ensuring that the project effectively blends into the overall transportation system. In particular, optimizing access to stations through improvements to non-motorized transportation modes is a high priority to us. We are confident that we will be able to work with Sound Transit and local jurisdictions to develop effective solutions.

Overall, we feel that the Draft EIS was thorough and well done. After conducting a review, we think there are a few areas that should be improved as the Final EIS is developed. The points we'd like to highlight are identified below. We will be sending detailed comments separately.

Transportation

Keeping WSDOT freeway management infrastructure on I-5 operational throughout construction is very important. This includes ensuring the closed-circuit television system, variable message signs, data stations, and ramp meters stay operational, with

S-003-001

Thank you for your efforts in working on the initial development of the Lynnwood Link Extension and for WSDOT's support for the project.

S-003-002

Sound Transit assumes that the I-5 freeway management systems will need to be operational through construction in order to help ease impacts of the construction. The Final EIS clarifies this assumption in Chapter 3, Transportation, Section 3.3. Sound Transit will continue to coordinate with WSDOT to develop a detailed approach.

S-003-001

S-003-002

Joni Earl
September 23, 2013
Page 2

S-003-002

reconfiguration as needed. A commitment to do this is in the Transportation Technical Report, but it should be among the mitigation commitments in the Final EIS and ultimately the Record of Decision.

S-003-003

Visual Resources

The analysis of visual and aesthetic resources is improved since our previous review, but we have identified further changes that should be made in the Final EIS to provide the robust analysis needed for the project. These changes are enumerated in the detailed comments we are providing. In general, we think that the degree of change to visual resources is understated for a number of locations and the analysis would benefit from greater clarity. However, this does not change the overall conclusion in the Draft EIS that virtually all of the alternative in each segment of the project will have some high impacts to visual resources.

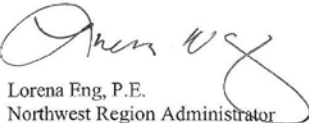
Regarding mitigation for visual resources, we appreciate that Sound Transit acknowledges the need to mitigate for impacts to areas acquired under the Highway Beautification Act of 1965 with replacement land. However, the Final EIS should also note that Sound Transit will be required to mitigate for the loss of vegetation within WSDOT right of way per our roadside policies. We would like the loss of vegetation, particularly the large trees, minimized as much as practicable.

We look forward to working with Sound Transit on the final design and implementation of this important project. Thank you again for the opportunity to review and comment on the Draft EIS.

Sincerely,



Brian Lagerberg
Public Transportation Director



Lorena Eng, P.E.
Northwest Region Administrator
Washington State Department of Transportation

cc: Lauren Swift, Sound Transit

S-003-003

Section 4.5 of the Final EIS includes revisions and clarifications to the assessment of visual impacts based on specific comments by WSDOT.

The Final EIS also provides updated discussion about Sound Transit's approaches to minimize the loss of vegetation, particularly large trees, to the extent feasible, with details to be defined during final design in consultation with WSDOT. Sound Transit understands the necessity to mitigate loss of vegetation consistent with WSDOT roadside policies and to mitigate impacts to areas acquired under the Highway Beautification Act. Sound Transit will work with WSDOT to accomplish this.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

September 23, 2013

Lauren Swift, Environmental Planner
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Lynnwood Link Extension Draft Environmental Impact Statement

Sent via e-mail

Dear Ms. Swift:

I would like to thank you for providing the Department of Ecology (Ecology) an opportunity to comment on the Lynnwood Link Extension Draft Environmental Impact Statement (DEIS). The Lynnwood Link Extension would extend light rail service from north Seattle to Lynnwood in Snohomish County. Ecology offers the following comments for the record as Sound Transit moves forward with planning for this project, which has the potential to significantly reduce traffic congestion and improve options for commuters.

S-004-001 The DEIS is a well-written and comprehensive review of the potential environmental impacts of the project. For consistency with the State Environmental Policy Act implementing rules (WAC 197-11-768) and state and federal standards in reviewing potential wetland impacts, avoidance and minimization are the first two steps in assessing potential impacts. Therefore, Ecology supports the alternatives that avoid and minimize impacts to wetlands and streams in the project corridor. While we realize this is a linear transportation project in a densely urban area, the Scriber Creek wetland complex (Wetland WLY4), the largest and highest functioning wetland in the project corridor, still provides some important habitat and stream support. There are options described in the DEIS that reduce potential impacts to this ecologically valuable resource. Ecology supports Alternatives C1 or C3 due to the reduced impacts to Wetland WLY4.

S-004-002 As the project design progresses, the wetlands potentially impacted by project construction will need to be delineated and rated, consistent with the current state and federal delineation and rating standards. The wetland boundaries and ratings will need to be field verified by agency staff. As described in the DEIS, it appears that the proposed wetland fill will require an individual Water Quality Certification (WQC) from Ecology. To avoid delays in project review and approval, we would recommend that applications be submitted to Ecology and the U.S. Army Corps of Engineers early in design process once the final alignment is selected. Ecology

S-004-001

The Preferred Alternative is a modified C3, which has slightly more impacts to wetlands, but also better balances other impacts and benefits. This project will abide by all applicable federal, state, and local environmental laws and regulations. Sound Transit's policy on ecosystem mitigation is to avoid impacts on environmentally sensitive resources to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects. The Lynnwood Link Extension would mitigate impacts on ecosystem resources in accordance with the mitigation sequencing requirements established by NEPA, SEPA, the Clean Water Act, and local critical areas ordinances. The Preferred Alternative design in the Final EIS has an alignment as well as structural and construction elements that help avoid and minimize impacts; the Final EIS also describes other mitigation that would be further defined during final design and permitting, including seeking mitigation opportunities within the Scriber Creek wetland complex.

S-004-002

All wetlands that may be affected by the Preferred Alternative will be delineated consistent with state and federal delineation standards, and wetland ratings will be updated as needed. Sound Transit will coordinate with regulatory agencies during permitting. Thank you for your offer of assistance during the application process.

Lauren Swift
RE: Lynnwood Link Extension DEIS
September 23, 2013
Page 2

S-004-002 | staff would be happy to assist Sound Transit should you have any questions on the state application and approval process.

Specific comments on the DEIS include the following:

S-004-003 | § 4.8.2, p. 4-135 The DEIS indicates that the Scriber Creek ordinary high water mark (OHWM) was not discernible within the Scriber Creek wetland complex. In these situations the OHWM is often located at the outer channels during ordinary high flow events. Ecology would be happy to assist Sound Transit in refining the OHWM for the final environmental impact statement (FEIS).

S-004-004 | Also on p. 4-135, DEIS states that stormwater flow control and treatment will comply with all local stormwater standards but that project may result in increased flows or duration of stormwater input to receiving waters. As mentioned, the proposed wetland impacts listed in the DEIS will require state authorization and likely an individual WQC. As part of the WQC approval, the project will need to be designed to meet the current state stormwater manual and consistent with the stormwater treatment and flow control standards for discharges to waters of the state, including wetlands.

S-004-005 | § 4.8.6, p. 4-146 The section discussing compensatory mitigation mentions the possible use of available approved mitigation banks as a mitigation option. There are currently no approved wetland mitigation banks within the project area.

S-004-006 | § 4.8.6, p. 4-147 The possibility of onsite mitigation within the Scriber Creek wetland complex (Wetland WLY4) is mentioned. Ecology would support a consolidated mitigation approach at this site due to the potential benefit to Scriber Creek and salmonids. The mitigation site will need to have adequate buffers and long-term protection consistent with state and federal guidance.

S-004-007 | § 4.9, p. 4-151 Relative to management under the state Shoreline Management Act (RCW 90.58; SMA), the DESI states that Ecology has delegated authority to regulate designated shorelines to the local jurisdictions. As a point of clarification, Ecology is the state agency that jointly administers the SMA along with the local jurisdictions. Ballinger Lake is apparently the only shoreline within the project area, but lakes are the only shoreline waters that need to be formally designated within the local jurisdiction's Shoreline Master Program. All other shoreline waters (tidal waters and streams with a mean annual flow greater than 20 cubic feet/second) and associated wetlands are under SMA jurisdiction whether or not they have been formally designated.

We look forward to continuing to work with Sound Transit on this important transportation project and to reviewing the FEIS. We would be happy to assist Sound Transit in any way that we can during the design and permitting of the Lynnwood Link Extension. If you have any questions or would like to discuss my comments, please give me a call at (425) 649 7148 or send an email to paan461@ecy.wa.gov.

S-004-003

Thank you for the offer to assist with the OHWM determination for Scriber Creek in the wetland complex.

S-004-004

Thank you for your comment. Sound Transit will comply with all applicable certifications and design standards, including Clean Water Act Section 401 Water Quality Certification and the Washington State Department of Ecology (Ecology) Stormwater Manual for Western Washington.

S-004-005

It is correct that there are no approved mitigation banks with service areas in the project area. The referenced statement is included to not preclude the opportunity to use any future mitigation banks that may have a service area within the project area.

S-004-006

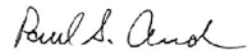
If project-specific mitigation is developed for this project, site selection would emphasize a watershed approach to consolidate compensatory mitigation sites. Plans would be developed in cooperation with resource agencies.

S-004-007

Thank you for your comment. The text of the Final EIS has been updated to clarify the roles of Ecology and the City of Mountlake Terrace with regard to Lake Ballinger shoreline regulation.

Lauren Swift
RE: Lynnwood Link Extension DEIS
September 23, 2013
Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Paul S. Anderson". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul S. Anderson, PWS
Wetland Specialist
Shorelands and Environmental Assistance Program

E-cc: Rebekah Padgett, Department of Ecology
Matthew Bennett, U.S. Army Corps of Engineers Seattle District Office



Shoreline Fire Department
Dedicated to the Protection of Life and Property

FIRE CHIEF
Matt Cowan

COMMISSIONERS
Ken Callahan Rod Heivilin
Jim Fisher Jon Kennison
David Harris

July 29, 2013

The Honorable Pat McCarthy
Chair, Sound Transit Board
401 South Jackson Street
Seattle, WA 98104



RE: Support or Light Rail Station at NE 145th Street in Shoreline

Dear Chair McCarthy:

L-001-001 The Shoreline Fire Department would like to offer its support for designating a Light Rail Station at NE 145th Street in Shoreline as part of Sound Transit's Lynnwood Link Extension Project.

We strongly support a station at NE 145th and I-5 as it will serve as a regional station. Due to its proximity to Bothell Way NE/Lake City Way NE (SR 522), the NE 145th Street station will act as a regional station for residents of Lake Forest Park, Kenmore, Bothell and potentially points east, and northwest Seattle residents. We believe that convenient access off main thoroughfares is the most appropriate location for a regional station.

L-001-002 In addition, we are concerned that a station at 155th Street may interfere with our existing Fire Station just east of I-5 and therefore may negatively impact response times due to increased bus and vehicle traffic the station would generate. Further, depending on the specific design of the rail line itself and/or the station and the subsequent increase in traffic, we may have to consider moving the facility all together.

L-001-003 The City of Shoreline has already begun station area planning which includes increasing density around stations to facilitate transit-oriented development. Part of that commitment is to increase pedestrian and bicycle access and improvements to the road network to facilitate transit to serve the stations. The City is also pursuing ownership of 145th Street in order to improve the transportation facilities for vehicles, buses and non-motorized users; therefore, helping to improve the access to the station.

L-001-004 The Shoreline Fire Department strongly urges you to designate NE 145th Street as a station location as it supports greater regional access, provides opportunities for improved transit and non-motorized transportation facilities, and allows for greater opportunities for transit-oriented development.

Thank you for your time and consideration of this important issue.

Sincerely,

Matt Cowan, Fire Chief
Shoreline Fire Department

17525 Aurora Avenue North • Shoreline, WA 98133 • PHONE: (206) 533-6500 • FAX: (206) 546-6719
www.shorelinefire.com

L-001-001

Thank you for your comment stating a preference and reason for preferring the station at NE 145th Street in Shoreline.

L-001-002

Sound Transit is aware of the Fire Department's concerns about the possible impacts of a light rail station at NE 155th Street on operations of the fire station at that location. If this station were to be advanced as part of the project, Sound Transit would further define measures to manage traffic serving the station while maintaining effective access for the fire station. Sound Transit would work closely with the city and the Fire Department to resolve potential conflicts with bus and vehicle traffic and to maintain emergency response times and access during the construction period and operation of light rail. However, the Preferred Alternative does not include this station site.

L-001-003

Thank you for noting the City of Shoreline's station area planning efforts around the NE 185th Street Station and at the NE 145th Street Station; the Draft EIS and the Final EIS both note the City's preference for these stations and include information about station access.

L-001-004

Thank you for the comment stating a preference for the NE 145th Street Station in Shoreline. This letter was noted in the materials provided to the Sound Transit Board, prior to their selection of the Preferred Alternative for Segment A, which includes a NE 145th Street Station.

Lynnwood Link Extension

Summer 2013



Draft EIS Comment Form

Submit your comments by September 23, 2013

NAME: Lauren Balisky, Utility Planner, Alderwood Water & Wastewater District
ADDRESS: 3626 150th St SW
CITY: Lynnwood STATE: WA ZIP CODE: 98087
EMAIL ADDRESS: LBAUSKY@AWWD.COM
☒ Please sign me up for project email updates

Sound Transit wants to hear from you. Comments can be about anything related to the project, ranging from giving an opinion or observation to discussing technical aspects of the environmental analysis. The extended public comment period ends September 23, 2013. All comments received or postmarked by this date will be responded to in the Final EIS.

Comments

L-002-001

The main water feed from Awwd to the City of Mountlake Terrace follows the Interurban south along I-5 to 44th Ave W @ the pedestrian bridge. Please work with the District to ensure that supply is maintained during construction.



L-002-001

Thank you for noting the importance of the District's main water line serving Mountlake Terrace and its proximity to the project. In producing the Final EIS and for the Preliminary Engineering for the Preferred Alternative, Sound Transit continued to identify utilities with potential conflicts; any plans for constructing the project would include a commitment to maintain service on significant connections such as the water line, and Sound Transit will continue to coordinate with the District during final design and construction.

Mayor
Mary Jane Goss

17425 Ballinger Way NE
Lake Forest Park, WA 98155-5556
Telephone: 206-368-5440
Fax: 206-364-6521
E-mail: cityhall@ci.lake-forest-park.wa.us
www.cityoflfp.com



Councilmembers
Don Fiene
Tom French
Jeff R. Johnson
Sandy Koppenol
Robert E. Lee
Catherine Stanford
John A. E. Wright

September 18, 2013

Sound Transit DEIS Comments
c/o Lauren Swift
401 S Jackson St.
Seattle, WA 98104

RE: Support for Siting Light Rail Station at 145th in Shoreline

Dear Sound Transit:

L-003-001 The City of Lake Forest Park has a vital interest in the outcome of the final decision on the siting of the Link stations for the Lynnwood Link Extension. Our residents have supported the objectives of Sound Transit since its inception and have long anticipated the promise of service commensurate to accommodate the need for regional transit service to the north-end cities beyond Seattle city limits.

Sound Transit representatives updated the City at our May 9, 2013 City Council meeting regarding the status of the Link stations still under study.

We would like to express our support of the following:

- Alignment of the Link Light Rail along the east side of the I-5 alignment through segments 'A' and 'B'.
- Locating segment 'A' stations at NE 145th and NE 185th Streets, as supported by the City of Shoreline.
- Providing adequate Park N Ride facilities at or very near Link stations is extremely important for system access by our citizens.
- Providing adequate bus capacity to serve the communities close to the stations.
- Designing stations to preserve the free-flow of east/west vehicular traffic, bicycle and pedestrian access across the I-5 alignment and to prevent choke points.

L-003-002 The City Council of Lake Forest Park recently passed the Southern Gateway Sub Area Plan zoning changes which allows for residential development and higher density along the SR-522 corridor beginning at 145th. The City committed significant time and resources to this planning effort, recognizing the need for housing along the transit corridor.

L-003-001

Thank you for your comment stating the City's overall support for the project, its preferred alignment and station locations, as well as other aspects of the project the City is encouraging. The Final EIS includes further information about how the Preferred Alternative and other alternatives would provide transit access and parking while maintaining effective multimodal access and circulation around stations.

L-003-002

Thank you for providing additional details about the City's progress in developing the Southern Gateway subarea plan and the need for improved transit access. The added density and provision for housing along the corridor connecting to a NE 145th Street Station are consistent with the future patterns of growth that Sound Transit anticipates in ridership forecasts for the project.

L-003-002 | Even with this housing in place, the majority of Lake Forest Park residents intending to use mass transit will continue to face the challenge of accessing transit options. Our physical geography and terrain make regular transit circulation service within the city impractical, and our citizens are forced to travel to transit system access points.

Siting stations on the east side of the I-5 alignment and providing parking in their immediate vicinity will allow them that access. Stations at 145th and 185th would provide Lake Forest Park with direct access to Link more than any of the other stations currently under study, and would provide an even 40-block separation between stations more effectively serving the population while maintaining system efficiency. As the configuration of SR-522 at Seattle's northeast boundary constricts all traffic on SR-522 southbound, the access to a 145th St station for commuters is essential and needed.

SR-522 helps to provide linkage to the UW Seattle and UW Bothell. A Link station at 145th (SR-523) would help to provide the first step towards regional transit access from the east side of Lake Washington to the Shoreline Community College. This route would be an excellent application for future bus rapid transit (BRT).

We appreciate your consideration of the needs of our citizens.

Sincerely,



Mary Jane Goss
Mayor

EXECUTIVE

September, 19, 2013

Joni Earl Chief Executive Officer
Central Puget Sound Regional Transit Authority
401 Jackson St.
Seattle WA 98104-2826

RE: City of Lynnwood Comments, Lynnwood Link DEIS

Dear Ms. Earl,

The City of Lynnwood's Vision, "Lynnwood Moving Forward Our Community Vision" (unanimously adopted in January 2009) states:

To invest in efficient, integrated, local and regional transportation systems.

This vision statement is totally consistent with, and the City has long supported bringing ST2 Light Rail Transit into the Lynnwood Transit Center. This transit facility is located in our PSRC designated Regional Growth Center.

L-004-001

Our staff has devoted substantial effort to working with Sound Transit on the initial development of the project. Our City has also focused on the potential future ST3 by undertaking a City funded study of how the LRT may be extended to have a station to serve our City Center.

The City's administrative staff has conducted a detailed review of the DEIS. I am submitting our administrative comments (fifteen pages September 3, 2013) on the DEIS to be considered prior to Sound Transit's selection of a preferred alternative and completion of the FEIS. Please note that these comments do not include comments or recommendation as to a route or station location. The Lynnwood City Council will be considering a resolution designating a recommended alignment and station location at their September 23rd meeting. The resolution will be emailed to you on the evening of September 23rd.

L-004-002

The City has several major concerns with the DEIS that can be summarized as follows:

- We believe traffic impacts on City streets will be considerably worse than presented.
- The City has concerns with Sound Transit's decision to undertake a separate analysis of the Operations, Maintenance and Service Facility (OMSF), since the projects are clearly linked to one another.

L-004-003

L-004-001

Sound Transit appreciates the City's collaboration through the Draft EIS preparation for the Lynnwood Link Extension and in the planning efforts for ST3.

L-004-002

The traffic analysis around the Lynnwood Transit Center Station has been updated for the Final EIS, including using Vissim software and expanding the coverage area to include the intersections related to the 196th Street/Poplar Way interchange. The scope of this revised analysis was coordinated with the City of Lynnwood, and is discussed in more detail in the Final EIS Transportation Technical Report.

L-004-003

Section 2.8.1 of the EIS describes the separate utility of the proposed Operations and Maintenance Satellite Facility (OMSF) under NEPA and SEPA. Sound Transit is currently developing a separate EIS for the OMSF, which evaluates operations and maintenance needs across the Sound Transit district and is not focused on a specific corridor. The Draft EIS for the OMSF was issued in May 2014.



L-004-004

- Sound Transit's expectation that 80% of riders will arrive by bus appears to be very optimistic. Failure to achieve this goal will result in significant traffic congestion and an extreme shortage of parking which will substantially interfere with properties in the area and will quite probably impact negatively our ability to achieve the goals of Lynnwood's City Center Plan.

L-004-005

- The analysis of C3 contains substantial errors as to which properties east of 44th Ave. will be demolished and taken. Further, C3 fails to consider impacts on our critical Lift Station 10 which is planned for expansion, has associated odor issues, and there is localized flooding in the same area.

L-004-006

- The DEIS fails to consider the implications that decisions made now with ST2 will pre-determine impacts that the potential ST3 will have on the City Center block located east of 44th Ave.

L-004-007

On behalf of the City I want to thank you for considering the City's administrative comments. I especially and sincerely appreciate your willingness to agree to my request that the DEIS comment period be extended substantially beyond the normal time period. This was very helpful for many of our residents to participate when they would have otherwise been doing summer vacations or related activities.

Sincerely,

Don Gough
Mayor, City of Lynnwood

CC: Sound Transit Board
Steve Kennedy, Sound Transit Staff

Attachments

L-004-004

The Final EIS has updated estimates for ridership and preliminary concepts call for even more connecting transit service when the light rail opens. However, the forecasts take into account the patterns of ridership that exist today, which has a fairly high number of riders reaching the Lynnwood Transit Center using transit. In addition, the estimated level of riders arriving by bus at the Lynnwood Transit Center Station reflects ridership for the entire day. Park-and-ride access would be higher during the peak period, while bus access would be higher during midday when parking is full, as is seen in many other areas in the Sound Transit system. The Final EIS also defines measures that would minimize the potential for spill-over parking into surrounding areas.

L-004-005

Sound Transit, in coordination with the City of Lynnwood, developed a modified Alternative C3, which was evaluated in the Final EIS and defined measures that would avoid impacting the City's ability to upgrade Lift Station 10. The property acquisition information for Alternative C3 has been updated in the Final EIS, including the error on page 4-29 of the Draft EIS that indicated that the La Quinta Inn would be displaced.

L-004-006

The Draft EIS did not include a detailed assessment of impacts to individual properties because any extension would need to be part of a future ST3 program that has not yet been fully defined or approved. While it would be speculative to identify specific properties, particularly given the lack of information on timing, the Final EIS does discuss under cumulative impacts the likely level of impacts that could occur.

L-004-007

Thank you for your comment.

**Sound Transit Lynnwood Link DEIS
City of Lynnwood Comments
September 3, 2013**

1. **General Comment:** Sound Transit has provided analysis of three track alignments and station locations referred to as C1 (north along 200th), C2 (middle route above existing bus platforms) and C3 (southern). Each option presents significant issues.
 - C1-Noise and visual impacts to homes along 52nd, impacts to Scriber Creek Park, removal of many homes and business along 200th
 - C2- Noise and visual impacts to homes along 52nd similar to C1, impacts to Scriber Creek wetland
 - C3-Poor location for supporting City Center development, potential impacts to a major City sewage lift station (10) and potential flooding issues and major property takes/loss of development potential on the block east of 44th (La Quinta Inn, Veterinary Building and others), poor access to bus transfers unless a completely new bus facility closer to the station is built at public expense.
2. **General Comment:** Sound Transit staff has referred to the three alternatives as “bookends” indicating that variations of the alignments may in fact be possible. Staff believes that an option we are calling “C3 Modified” is worthy of study. As envisioned it would leave the I-5 ROW at the same point as C3, eliminating direct impacts to homes along 52nd, avoiding Scriber Creek Park and the need to acquire homes and businesses along 200th. It would run over the rear of the School District property, behind their proposed building over an open area designated for outdoor bus parking. It would enter the Transit Center on an angle, running northeast. The station would be located near the existing bus platforms supporting intermodal access and eliminating the cost of relocation. The tail track would be aimed in the general direction of the intersection of 200th and 44th in such a way that under ST3 the line could be extended over or adjacent to Alderwood Mall Boulevard thereby avoiding most of the properties on the block east of 44th. This alignment would offer a station location that creates good development potential (due to better access) in City Center. This option would also avoid impacting City Lift Station 10 which is planned for a major expansion, associated odor issues and potential flooding problems experienced in that area. C3 Modified is presented in a map attached to this document.
3. **General Comment:** The Lynnwood Link DEIS contains a critical flaw. In spite of earlier requests by the City, the DEIS disregards the impact result directly from ST2 decisions when ST3 is advanced. The three track alignments and station locations in Lynnwood will of necessity result in three different alignments of track extensions under ST3 when this project advances. The three alignment options therefore have an immediate, direct and immutable impact upon the entire block bounded by 44th Ave. W, 40th Ave. W, Alderwood

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 1 of 16

L-004-008

The City's concerns for Alternative C1 are noted and are addressed in more detail in response to your comments below.

L-004-009

Thank you for your comment. Responses to these comments are provided where they are discussed in greater detail in your comment letter.

L-004-010

Thank you for identifying the City's concerns with Alternative C3; modifications of Alternative C3 developed with Lynnwood staff have reduced impacts on the block east of 44th Avenue W and improved the light rail station/transit center connection. This modified Alternative C3 is evaluated in the Final EIS.

L-004-011

The Final EIS incorporates and examines in detail Alternative C3 Modified, which was developed in coordination with the City.

L-004-012

The Draft EIS did not include a detailed assessment of impacts to individual properties because any extension would need to be part of a future ST3 program that has not yet been fully defined or approved. It would be speculative to identify specific future properties for acquisition and displacement, particularly given the lack of information on timing and the potential that future projects could involve alternatives that avoid the next property or properties. However, the Final EIS does discuss under cumulative impacts the likely level of impacts that could occur for each alternative. This includes the modified Alternative C3, which avoids some of the properties of concern to the City.

L-004-012

Mall Boulevard and I-5. This block is located within Lynnwood's City Center-Core which is planned for the highest density urban development in Lynnwood. Redevelopment of this block is critical to realizing the goals of the City Center Plan and also to achieving the goals of the State Growth Management Act and designated Puget Sound Regional Council's Regional Growth Center. Impacts of the planned but as yet unfunded ST3 extension in this area must be assessed to provide a full analysis of the impacts from Lynnwood Link. As presently designed, the C1 alignment would allow for the track extension to align with Alderwood Mall Boulevard offering the probability of the lowest amount of impact on the City Center Core block for the future extension. C2 has some potential for impacts from a future extension on the southwest corner of the City Center Core block although the City has been informed that it may be possible to route the track in the vicinity of I-5 and the Interurban Trail thereby minimizing impact on the block. C3, whose tail track has a significant immediate impact upon the City Center Core block in the current ST2 phase of Sound Transit's expansion, under ST3 results in splitting the triangular block in half rendering it difficult or impossible to redevelop in any meaningful manner. Further, is this centerline is extended further it appears that additional City Center blocks further east could be impacted as well. We also note that the DEIS erroneously states that C3 will require removal of the La Quinta Inn when in fact it will require removal of a multi-story office building located west of the hotel. The La Quinta appears to be able to remain at this point although it appears that it could be significantly impacted by having the tail track proximate to and aimed at their upper floors. As such Alternative C3 removes this block slated for the highest density development in the Lynnwood Regional Growth Center from being utilized as planned and runs counter to both the purpose and need statements (pages S-2, 1-4, 1-5 and 5-2) for the Lynnwood Link project and to the Federal New Starts Economic Effects criteria to support the project's funding (p. 5-13).

L-004-013

4. **General Comment:** Sound Transit is assuming the some 16,000 of the 20,000 daily boardings at Lynnwood will be arriving by bus in the form of intermodal transfers. The DEIS does not appear to contain an analysis of whether the bus providers have sufficient capacity to handle this increase in ridership and if not, how they will be able to obtain funding to achieve it. The City is also critically concerned that the significant increase in bus movements combined with parking for 500 additional cars, most of which would occur during a short period of time (peak hours) will significantly impact Lynnwood's street system in ways the DEIS fails to analyze. While some of the bus routes will use the direct ramps to I-5, many more along with all the automobile traffic will use local streets that already have capacity issues. In addition, many of the commuters will arrive from points north of Lynnwood. The closest I-5 interchange this traffic can use is at Poplar Way. Sound Transit's traffic analysis fails to assess this impact.

L-004-013

An analysis was conducted regarding the capacity of local bus service to accommodate the increased demand, and it was determined that buses would not be overloaded. Also, while Sound Transit does not have authority over funding for improvements to local bus transit service, Sound Transit will coordinate with Community Transit in the development of appropriate modifications to local bus service to best accommodate demand at the station. Regarding traffic arriving from points north of Lynnwood, an updated analysis has been performed using microsimulation to better capture congested conditions, which is reflected in the Final EIS.

L-004-014	5. General Comment: All references to Lynnwood creating a Town Center need to be changed to City Center.
L-004-015	6. S.2 Purpose and Need for the Lynnwood Link Extension, P. S-2: Purpose and need for the Lynnwood Link Extension: The project is needed to... <i>Create the transit infrastructure needed to support the development of Northgate and Lynnwood (language proposed by the City)- the corridor's two designated Regional Growth Centers.</i>
L-004-016	7. S.9, P. S-31 and 5.3.4, P. 5-15 Areas of Controversy and Issues to be Resolved: The DEIS claims that both Lynnwood and the Edmonds School District "expressed concerns" regarding the potential location of the Operations and Maintenance Satellite Facility (OMSF), in Lynnwood. This statement incorrectly characterizes the positions of the City and School District. Both Lynnwood and the District opposed the designation of an OMSF site in Lynnwood in writing (in Lynnwood's case a Resolution adopted by the City Council) and in verbal comments offered at the ST Board Public Hearing. The many obvious flaws of this site were pointed out including its location directly across the street from hundreds of affordable homes, impact to critical wetlands and the fact that the School District has approval to build their Administration complex on the site. Both the City and District asked the ST Board to eliminate the Lynnwood OMSF site from consideration. The Board went ahead and approved consideration of the site along with others in Bellevue. It is also significant to note that the two Board representatives from Snohomish County stated on the record that by voting to approve consideration of the Lynnwood site, they understood its many flaws. Further, it was their desire to see an OMSF located not in in Lynnwood, but rather near Payne Field when ST3 is built.
L-004-017	8. Table 2-1c Alternatives Considered, Summary of Design Features for Segment C Alternatives, P. 2-13: Description of the alternatives ends at the Lynnwood Transit Center. The table fails to mention that the C3 tail track will extend across 44 th Ave and require removal of buildings east of 44 th or the resulting impacts from ST3 extensions that would result from ST2 decisions.
	9. 2.5.2 Alternatives Considered, Developing Details of the Alternatives, P.2-35: "The evaluation criteria included the following factors: ... Station area development potential (existing land use <u>and</u> transit-oriented development potential". The DEIS focuses on existing land use for alternative C3 and fails to mention impacts of C3 on the high density development potential dividing the block north of 44 th in half with its tail track. We disagree that the alternative C3 station location has the same development / TOD potential as C1 and C2 which are closer walking distances to the City Center, (within the PSRC Lynnwood Regional Growth Center slated for highest development potential in Lynnwood). P. 4-18 states that Segment C ends within the Lynnwood City Center, inside of the PSRC -

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 3 of 16

L-004-014

The Final EIS has been revised to change "Town Center" to "City Center."

L-004-015

The comment appears to state the purpose and need as it was published; it is unclear what other language the City is proposing. Sound Transit is retaining the purpose and need as it was published in the Draft EIS; the current purpose and need reflects public input from two scoping periods that were held prior to the Draft EIS development.

L-004-016

As described above (per Section 2.8.1 of the Draft EIS), the Link Operations and Maintenance Satellite Facility (OMSF) is a separate project that would support the Lynnwood Link Extension as well as East Link and other ongoing system growth. The separate OMSF Draft EIS published in May 2014 evaluated the impacts from alternative locations for that facility. The Final EIS for the Lynnwood Link Extension has been revised to note the opposition of the City and the School District to the site.

L-004-017

The intent of Table 2-1C was to convey design features and potential impacts for the Draft EIS alternatives, and did not attempt to speculate about possible impacts or conflicts with potential future planning efforts related to the Long-Range Plan or future development projects that have not yet been defined. Potential property impacts associated with the proposed Alternative C3 are discussed in the Draft EIS in Chapter 4 (Section 4.1 Acquisitions, Displacement, and Relocation). Table I-4.1.3 in Appendix I-4.1 Acquisitions, Displacements, and Relocations identifies five parcels that could potentially be affected by the tail track under Alternative C3.

L-004-017
2 designated regional growth center, which is anticipated to accommodate much of the
3 growth between Northgate and Everett. If this growth is to be accommodated, then the
4 impacts of eliminating the development potential of a large block of the highest density in
5 City Center, needs to be clearly identified and mitigated.

L-004-018
7 **10. 2.8.1 Link Operations and Maintenance Satellite Facility:** This section contains several
8 factual errors and misstatements. The fact that analysis of the OMSF has been severed
9 from the Lynnwood Link DEIS remains a questionable decision and tactic. ST has made it
10 clear that ST2 cannot operate without an OMSF being built somewhere thus the projects
11 are inextricably linked. Under Washington environmental law they would be required to be
12 analyzed together.
13
14 **11.** The DEIS purports that the OMSF DEIS will be issued “in late 2013 or early 2014”. We have
15 recently been informed that due to unspecified problems the release date is being pushed
16 back to the summer of 2014. This is particularly unfortunate since Lynnwood residents and
17 homeowners who will be severely impacted by the OMSF will not have any certainty
18 regarding their future for a protracted period of time. During this time they conceivably will
19 have difficulty in selling their homes or deciding if repairs or improvements are warranted.
20
21 **12.** The DEIS states that “because the projects have independent utility” this DEIS does not
22 analyze the impacts of the OMSF. The City questions how it can be concluded that the
23 OMSF has independent utility? “But for” ST2, Lynnwood Link and other planned extensions,
24 the OMSF would not exist. Then the text goes on to actually discuss some of the potential
25 impacts of the OMSF in somewhat favorable terms which violates the supposed separation
26 between the two projects while being misleading and erroneous.
27
28 **13.** It is noted that the OMSF would occupy parcels of land needed for the School Districts
29 support center but then concludes that if the site is selected ST would work with the District
30 on joint use. In fact, ST has attempted to work with the District on joint use and has been
31 rebuffed being informed that the School District Service Center will be moving forward.
32 Further, the DEIS fails to state that ST has no ability to exercise eminent domain over
33 District property.
34
35 **14.** The text also asserts that “potential cumulative effects” of the OMSF have been analyzed in
36 this DEIS. ST staff has repeatedly told City staff that the OMSF would need to be completed
37 and opened well in advance of the completion of Lynnwood Link to prepare rail cars for
38 service. The opening date for the OMSF is marketed as 2020 whereas the tracks will not be
39 completed to Lynnwood for another three years. As such, there should be no cumulative
construction impacts. If anything, there will be sequential impacts where construction

Sound Transit assessed TOD potential within station areas based on four key factors: existing conditions, transit-supportive plans and policies, station access, and potential development opportunities. Among the three Lynnwood alternatives, some minor differences were noted in the assessment. However, these differences were not significant enough to warrant a change in the overall rating and therefore ratings were similar for all alternatives.

Through coordination with the City of Lynnwood, Sound Transit developed a modification to the alignment proposed under Alternative C3. The revised alignment is a component of the Preferred Alternative, which relocates the tail tracks to run directly south of Alderwood Mall Boulevard, preserving the majority of the block east of 44th Avenue W. In Section 4.2.4 of the Final EIS, a comparison of the TOD potential will be revised to include the modified alignment. In addition to analysis of the new alignment under the Preferred Alternative, the Final EIS revisits the TOD assessment performed for the Draft EIS.

L-004-018

The decision to treat the OMSF as a project with independent utility was made by FTA in conjunction with Sound Transit, but the two projects have continued to disclose their combined impacts in cumulative effects discussions. Sound Transit recognizes the City's concerns with the Lynnwood OMSF site, but comments about that project are being addressed through that project's separate process. As such, this project has no influence over the OMSF EIS schedule; the OMSF Draft EIS was published in May 2014.

L-004-018 activity will go on for years. The text needs to be revised. Either all OMSF impacts should
2 be analyzed or none should and the positions of the parties should be accurately presented.
3

L-004-019 **15. 3.1.7 Parking, P. 3-16:** The DEIS offers an analysis of on-street and private parking
5 availability proximate to the three C alignments in Lynnwood without clarifying why this
6 exercise was undertaken or potential implications. The only conclusion we can draw is that
7 this represents a back-door plan for ST to find ways to utilize parking outside of the transit
8 center for commuters. This is completely unacceptable to the City. On-street parking is for
9 the use of local residents or customers, not commuters. Similarly, privately owned parking
10 in City Center represent a major part of the areas potential to support redevelopment
11 consistent with City plans, State Growth Management Act and the Puget Sound Regional
12 Council's Vision 2040. Off-site parking is completely unacceptable to the City. ST is being
13 asked to eliminate this analysis from the DEIS and commit to the City in writing that there is
14 no intention or plan to seek commuter parking outside of what can be accommodated
15 within the Lynnwood Transit Center.
16

L-004-020 **16. 3.2.4 Arterials and Local Streets, P. 3-37 / 3.4 Indirect and Secondary Impacts, P. 3-48 / 4.1**
18 **Acquisitions, Displacements and Relocations P. 4-3:** The majority of the southbound traffic
19 of the to the Lynnwood ST2 terminus will come from points north on I-5 and enter the City
20 Center at the only available southbound interchange in this area at 196th SW (SR 524).
21 This access will significantly increase traffic impacts not only at that interchange and off-
22 ramp into the City Center, but through the entire City Center street system to access the
23 transit center. Traffic will be required to traverse local, collector and arterial streets
24 resulting in significant impacts. This will be compounded by the large increase in bus traffic
25 resulting from the fact that ST is projecting that 89% of the 20,000 riders each day will arrive
26 by bus. Studying only a 0.5 mile radius is inadequate in this case. The intersections from the
27 I-5 / 196th off-ramp to 40th Ave. W need to be studied.
28

L-004-021 **17. 3.2.7 Parking, P. 3-39 / 3.6.7 Parking, P. 3-54:** It is noted that if spillover parking occurred in
30 Lynnwood it would be onto private property (in the City Center this parking is planned for
31 high density redevelopment to accommodate regional growth) which the City would then
32 need to patrol locally. This spillover parking is an unacceptable result. It would damage the
33 City's ability to achieve the goals of the City Center Plan while adding to the City's cost to
34 patrol and manage. The text also states the amount of parking provided at each station
35 may be further refined in future phases. The parking proposed for the Lynnwood station
36 needs to be sized appropriately to reasonably accommodate the projected 20,000
37 boardings per day.
38

L-004-022 **18. 3.5 Transportation Cumulative Impacts, P. 3-48:** 1) This section does not address the
40 impact to the residential neighborhood adjacent to the OMSF with the increase in late night

L-004-019

Sound Transit generally does not support the use of on-street parking or parking in privately owned lots for transit users, although some private lot use is used by other transit agencies in the region. The parking analysis was performed to determine the current parking utilization in the area, and to see if there would be potential for hide-and-ride parking impacts. As described in the Draft EIS, if there are impacts, mitigation measures, such as adding parking zones and monitoring private lots, could be used to minimize the potential for hide-and-ride parking. Section 3.6 of the Final EIS specifically identifies the mitigation measures Sound Transit proposes to apply.

L-004-020

The analysis has been expanded to include the I-5/196th Street/Poplar Way interchange to better determine impacts.

L-004-021

Additional analysis has been performed to evaluate additional parking at the Lynnwood Transit Center Station. Long-term parking impacts are examined in Section 3.2.7 in the Draft EIS.

L-004-022

Issues related specifically to the OMSF are being addressed through that project's independent EIS review process.

L-004-022	trips from midnight - 5 am which may be disruptive to the sleeping residents. 2) Strike the references relating to the ESD plans, as this has no relation to the Lynnwood Link project (additionally it omits that the administrative building will buffer the bus fleet to the street and residents). 3) Any discussion of the OMSF in Lynnwood should also include the requirement for a second smaller OMSF facility being still required in Bellevue. It should also note that if the OMSF is built in Bellevue, no facility would be needed in Lynnwood.
L-004-023	19. 3.6.3 Transportation - Freeway Operations, P. 3-49: DEIS text should be corrected as follows: “or may affect <u>adjacent</u> freeway ramp operations” to “or may affect <u>nearby primary access</u> freeway ramp operations” or similar. The adjacent freeway ramp at I-5/44 th is only a half interchange and does not provide the access from the northern boarders that the I-5/196 th off-ramp will.
L-004-024	20. Table 3-27 Transportation, Segment C Potential Mitigations, P. 3-53: Restriping the 200 th /44 th intersection as proposed is not sufficient to accommodate 20,000 daily boardings at an already low functioning roadway particularly during the PM peak. Plans should study widening City Center streets to accommodate ST’s projected vehicular and transit trips on 200 th St SW, 40 th Ave W and 48 th Ave W.
L-004-025	21. 4.1 Acquisitions, Displacements and Relocations: Information concerning some of the impacts of the three track alignments in Lynnwood is missing or contains errors: (1) In all cases there is a failure to analyze the impacts of extending any of the C alternatives under ST 3 even though they are directly linked to alignment decisions made in ST2. (2) Information concerning the impacts of C3 is erroneous. The DEIS indicates that C3 would result in the removal of one business, the La Quinta Inn hotel east of 44 th Ave. This is incorrect since the tail track must impact one or two other commercial buildings west of the hotel before it can get there. This concern was raised to ST staff who indicated an error had been made in the DEIS. Apparently the hotel will not be fully taken in ST2 but a multi-story, multi-tenant commercial building would be. Clarifications and updates to all related items are necessary. The DEIS fails to analyze the potential for increased costs and impacts due to inverse condemnations of other properties in the vicinity. 22. It is evident that the La Quinta hotel would need to be taken in ST3 if C3 is selected in ST2. The hotel would also have impacts under ST2 related to the end of the tail track pointed at and close to the building. The DEIS also fails to accurately indicate impacts that would result from C3 to businesses located near I-5. Because of these errors, the true cost of C3 is misstated and likely is greater than indicated. It is not possible to accurately weigh the pros and cons of the C1/2/3 alignments without this critical information taken into account.

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 6 of 16

L-004-023

The sentence will be updated as suggested.

L-004-024

The Final EIS Chapter 3 includes updated analysis of the project's impacts related to trips to the Lynnwood Transit Center Station and park-and-ride, including the intersections of 200th with 40th Avenue W, 44th Avenue W, and 48th Avenue W. The Preferred Alternative includes street widening and intersection improvements as part of its definition, which addresses impacts previously described in the Draft EIS for all alternatives.

L-004-025

In responses above, Sound Transit has addressed the reasons why the impacts of potential future extensions are not identified in detail in the Draft EIS; the potential effects of possible ST3 projects are discussed in the Final EIS, but it remains premature to identify possible impacts to specific properties.

For the acquisitions information, the properties identified in Section 4.1 Acquisitions, Displacements and Relocation and in the related appendix are accurate; the hotel was incorrectly identified as a displacement in Section 4.2 Land Use, and this has been corrected for the Final EIS. However, the level of impacts by alternative, as well as the proposed mitigation measures, remain otherwise accurate, and the information in the Draft EIS gave an appropriate basis for public review and discussion of the alternatives under consideration. The Draft EIS notes that the parcel-level impacts are based on conceptual designs, and any properties required for the project would be covered by Sound Transit commitments to conduct property acquisition activities in accordance with state and federal law.

L-004-026

23. 4.1.5 Cumulative Impacts, P. 4-9 and Appendix H - Other Projects Considered for Cumulative Effects, P. H-3 and H-4: The Lynnwood City Center should be included in these sections. The recently approved 308 unit Lynnwood City Center Senior Living Apartments on 1.8 acres located at 19501 40th Ave. W in the City Center should also be included separately, as these are as relevant to the Lynnwood Link as both the Mountlake Terrace Senior Living Apartments and the Mountlake Terrace Town Center plan are. The Poplar Way Bridge across I-5 at 33rd Ave. W should also be included as this will impact off-ramp access and finally the 196th widening and addition of possible Bus Rapid Transit Lanes should also be included in the evaluation.

L-004-027

24. Section 4.15 Cumulative Impacts: Alternative C-3 directly impacts City of Lynnwood Wastewater Pump Station #10 and associated piping under the existing transit station parking lots. The City Center Sub-Area Plan (September, 2007) states the following: *All of the wastewater generated in the City Center Sub-Area flows to Lift Station 10, either by gravity or from force-mains associated with pump stations No. 4 and 8. Flow collected at Lift Station No. 10 is pumped to a 36-inch interceptor line via a 9,500 ft 24-inch force main, where it then gravity flows to the treatment plant. The capacity of Lift Station 10 is 6,000 gallons per minute (8.84 million gallons per day). Since existing peak hour flows exceed the capacity, modifications to Lift Station No. 10 will be required, or construction of a new lift station to bypass a portion of the flow.* There are likely impacts to the station in the existing condition, and necessary expected upgrades. At a minimum, there are likely temporary impacts during construction. The pump station was not even identified in the EIS, let alone any potential impacts analyzed. Impacts to this essential public facility must be analyzed and addressed. Further, There are odor issues associated with the lift station that would become an issue if the LRT station and bus bays were located adjacent to it as proposed. Finally, there are localized flooding issues in this area that ST appears to have overlooked.

L-004-028

25. Table 4.2-1, Locally Adopted Plans and Policies, P. 4-13: City of Lynnwood Plans should also include:

- City Center VMT & CO2 Emissions Modeling Report, January 2010;
- ULI Innovations TOD Workshop June 25, 2009 - Lynnwood Station Team Presentation;
- Extension of Light Rail to Lynnwood City Center Technical Memorandum, August 2011
- City of Lynnwood Economic Development Action Plan, 2005-2010

26. 4.2.1 Affected Environment, P. 4-18: DEIS text should be corrected as follows:

"Lynnwood's zoning regulations and design guidelines support ~~a mixed use~~ high-density ~~neighborhood development~~ in the City Center near the existing Lynnwood Transit Center, which is composed of three districts. The density ~~types of use~~ permitted varies among the districts. All Segment C station alternatives are located in the "City Center West" zone, envisioned to have a mix of ~~high density mixed-use~~ residential, retail, restaurants, and office, ~~and high-density housing~~. The tail track of Alternative C3 would cross 44th Avenue West into the ~~center of the large block of the~~ higher density "City Center Core" zone, the

L-004-026

Thank you for identifying these additional projects for consideration in the cumulative effects analysis. Appendix H in the Draft EIS did include the 196th widening project, but did not include the other three projects that you mentioned. The Final EIS now reflects these projects in Appendix H.

L-004-027

Sound Transit has worked with Lynnwood staff to define the modification to Alternative C3 to address concerns about the original alternative. Those modifications are evaluated in the Final EIS, and do not conflict with the current footprint of the lift station facility. However, in response to the City's concerns, Sound Transit will coordinate further design and construction for Alternative C3 so as not to preclude or conflict with the City's ability to expand the capacity of the lift station. At this time, the City does not have detailed designs for the expansion, and initial conversations with the staff have indicated that expansion would involve equipment upgrades more than a physical expansion of the facility's footprint. However, consistent with mitigation measures described in Section 4.15.5, this coordinated approach to final design and construction would address potential conflicts.

Floodplains within the project area, and in the vicinity of Alternative C3, were discussed in Section 4.9.2 in the Draft EIS.

L-004-028

The Economic Development Plan has been added to the discussion of adopted plans and policies. The other documents are not directly related to land use plans and policies adopted by the City, so they were not added to the Final EIS. The purpose of the land use review is to identify potential conflicts with existing land use plans. The suggested edits to the text in Section 4.2.1 were made in the Final EIS. The TOD potential report did not include specific property impacts. This assessment has

- L-004-028** highest density permitted in the Lynnwood Regional Growth Center and citywide.” The implications of this tail track combined with the ST3 extension resulting from this alignment require further evaluation.
- L-004-029** 27. 4.17.1 Affected Environment, Parks; **P. 4-220:** Scriber Creek Park, Alternative C1. It states that approximately 0.42 acre of the park would be directly affected. This is a small, pastoral park and the impact from and overhead LRT line is understated. It further states that the elevated guideway would change the experience of the parking lot. We would add that, depending on the location of the support columns, it could potentially eliminate parking spaces needed for the park. Under Alternative C2, it is states that the park is not considered noise sensitive due to higher ambient levels and its activities do not require quiet surroundings. Scriber Creek Park is a passive natural park with no active recreation facilities. Within the interior of the park street noise is negligible most of the day; park users enjoy bird watching and quiet walks through the park accompanied by the sounds of birds, frogs, etc. The park currently provides a quiet environment for these passive recreation activities. We would request that noise mitigation be provided for the park and the trail if required to achieve the existing ambient noise level.
- L-004-030** 28. 4.17.6 Potential Mitigation Measures p 4-225, Scriber Creek Park. Further research has revealed that the acquisition of the park property was funded by a grant from the Snohomish County Conservation Futures Program in 1991. The Interlocal Agreement describes the use of the “real property forever for purposes consistent with the preservation, protection and maintenance of the property for open space.” In addition the Deed of Right to Use Land for Open Space Purposes states “The Grantor (City of Lynnwood) will not make or permit to be made any use of real property.... Or any part of it which is inconsistent with the right of use for public open space purposes herein granted unless such use is authorized by applicable law and the County consents to such use.”
- L-004-031** 29. 4.18.5 Potential Impacts on Section 4(f) resources, p 4-241, The DEIS states that Scriber Creek Park is not considered a noise-sensitive resource. As a passive and natural recreational facility, noise from trains and direct construction would impact the park in ways the DEIS fails to analyze.
- L-004-032** 30. 4.2.2 Long Term Impacts, **P.4.27: Segment C Mountlake Terrace to Lynnwood:** DEIS test should be corrected as follows: “Segment C extends to the proposed Lynnwood Transit Center stations and the just into the far southwest corner of the City Center subarea. The proposed stations would be on the east end of the City Center West zone. This zone is envisioned to include a dense mix of commercial (office, retail, and service) uses and a concentration of mid-high density mixed-use residential units. In Alternative C3 the tail track would cross over 44th Avenue West ending in the middle of a block in City Center Core zone, which otherwise would accommodate higher-density mixed-use development.”
- L-004-032** 31. **Alternative C2:** “Alternative C2 would acquire and “convert” fewer properties than Alternative C1, and it would not convert any multifamily residential properties.” It may not “convert” it has the potential to impact a multi-family apartment property with its adjacency as it runs into the Transit Center If noise mitigation is not provided.

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 8 of 16

been updated in a separate document that continues to be referenced in the Final EIS.

L-004-029

The Draft EIS noted that the elevated light rail structure above the parking lot would change the character and user experience of this area of the park, as discussed in the Scriber Creek Park evaluation in Section 4.17.2 of the Draft EIS.

The use of Conservation Futures Funds for property acquisition creates a requirement for review and approval by the original funding jurisdiction if the property is transferred for a different use. Approval of a transfer typically requires mitigation. These requirements were taken into consideration in the selection of the Preferred Alternative and the process to identify mitigation for impacts. However, as noted in several chapters of the Final EIS, Section 4(f) impacts related to the park would not allow Alternative C1 to be approved by FTA without modifying the alternative to either avoid the park or reach agreement with the City that the impacts are minor.

L-004-030

The Draft EIS discussion did address noise effects to the park on page 4-241, although it noted that FTA's definition of a noise sensitive property would not place the park as highly noise sensitive given the lack of quiet in the park today, and that park activities did not require quiet. However, for the Final EIS, the park has been identified as noise sensitive, consistent with the OMSF project Draft EIS and further discussions with the City. Noise mitigation to be applied for nearby residences (which are noise sensitive) would also help reduce noise levels within the park. Construction activities affecting the park were noted on the same page in the Draft EIS, and the Final EIS more specifically mentions noise as one of the common types of construction period impacts.

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- L-004-032** 32. **Alternative C3:** DEIS text should be corrected as follows: “Alternative C3 would acquire and convert the fewest properties to transportation use. The affected parcels would be single-family, commercial, industrial, public, and institutional properties ~~and only one existing use (La Quinta Inn) would be displaced~~. These changes in land use ~~are not expected to markedly alter land use patterns or development character will significantly alter the land use of this highest density zoned block in Lynnwood’s City Center and Regional Growth Center. The Lynnwood Transit Center Station Options 1 and 2 have different layouts but would affect the same areas, and the land use impacts for both options would be similar.~~ Both C1 and C2 station options would be compatible with area development patterns and could reinforce intensification of commercial and higher-density multifamily uses near the station. The C3 station location is remotely located away from City Center and access by pedestrians,” The impacts of C3 are different as C1 and C2 do not remove development potential from the City Center Core and are more walkable distances to TOD developable properties, better supporting state, regional and local growth management plans).
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- L-004-034** 33. **4.2.4 Indirect and Secondary Impacts, P. 4-31:** The following impacts of Alternative C3 related to the Sound Transit adopted TOD policy from 2012 need to be addressed in the EIS:
- “Support implementation of state, regional and local growth plans, policies and strategies”: C3 removes high density development potential with the tail track and future extension under the potential ST3.
 - “Encourage convenient, safe multi-modal access to the transit system, with an emphasis on non-motorized access”. C3 walking distance is furthest from developable property within City Center.
 - “Support economic development efforts”. C3 provides the least support for City Center TOD redevelopment. This option removes developable land within the core of the City Center which is further compounded by future impacts of ST3. C3 damages and ultimately eliminates two hotels that are critical to Lynnwood’s tourism industry.
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- L-004-035** 34. “To assess land use and economic development performance, the report considered access to regional growth centers and the station area development potential for the station areas served by each alternative. An overall rating was assigned to each station area based on its relative potential to support transit-oriented development, which was assessed by four elements:
- Existing conditions supporting transit-oriented development
 - Transit-supportive plans and policies
 - Station access
 - Potential development opportunities”
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- L-004-036** 35. **4.2.4 Land Use Indirect and Secondary Impacts, P. 4-32 and Table 4.2-3 Summary of Station Area TOD Potential by Station Area, P. 4-33:** Arguably, TOD potential in Lynnwood is much higher than the equally ranked Mountlake Terrace options which have only a small

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 9 of 16

L-004-031

This text was revised for the Final EIS generally as suggested.

L-004-032

Sound Transit's noise mitigation commitments, described in Section 4.6, address potential noise impacts.

L-004-033

Text has been added to the Final EIS to revise the parcels that would be affected and to revise the statement regarding land use patterns and development character.

L-004-034

Sound Transit's TOD policy was considered in the development of TOD potential for the project, which was referenced in the Draft EIS. Sound Transit assessed TOD potential within station areas based on four key factors: existing conditions, transit-supportive plans and policies, station access, and potential development opportunities. Sound Transit has considered the City's comments and a comparison of TOD potential will be revised to include the modified Alternative C3. In addition to analysis of the new alignment under the Preferred Alternative, the Final EIS revisits the TOD assessment performed for the Draft EIS.

L-004-035

As noted above, the evaluation of TOD was documented in a supporting planning document and was used in the EIS primarily as a means for weighing the potential magnitude of future changes in land use if a station were built. Among the three Lynnwood alternatives, some minor differences were noted in the assessment. However, these differences were not significant enough to warrant a change in the overall rating and therefore ratings were similar for all alternatives. Sound Transit has

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L-004-030
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amount of developable land in close proximity and Mountlake Terrace is not a designated Regional Growth Center. We would also argue that Lynnwood's TOD potential is on par with Northgate's. Further since Northgate has already seen significant intensification long before the arrival of LRT, going forward in the timeframe of Lynnwood Link, Lynnwood City Centers potential is much higher. Within the Lynnwood Transit Center we also take exception with the equal ranking of TOD potential for all of the alignments and station locations. C1 with a station proximate to 200th and City Center clearly has the greatest potential. C2 offers decreased but still significant potential particularly if ST actively encourages redevelopment over their property. C3 has a station located in a remote and largely hidden site far removed from developable property, City Center and pedestrian access. The C3 tail track and its extension under ST3 also eliminate major potential TOD sites east of 44th Ave. C3 is focused on serving commuters rather than being supportive of TOD and meeting the goals of the City Center Plan. The City believes that in so doing C3 does not meet the criteria required under the Federal New Starts program that will be providing essential funding.

36. 4.2.2 Economics Impacts of Displacements on Tax Base for Cities, P. 4-41: Revenue potential for the highest density zone in the City Center under the C3 alternative will be significantly impacted by tail track construction into middle of the block. This will be further exacerbated by the extension of the line under ST3. These impacts must be analyzed and considered.

37. 4.2.5 Cumulative Effects, P. 4-34: If the OMSF is to be open by 2020 construction will not be concurrent with the Lynnwood Link Extension completed by 2023. Thus there will be no simultaneous construction activity to take advantage of. In fact, the opposite is true. Due to construction schedules the surrounding area will be impacted by construction activity for an excessively protracted period of time. The DEIS and its assumptions must be corrected.

38. 4.3.5 Economics Cumulative Impacts, p 4-46: The DEIS states that the OMSF would have similar or greater multiplier effects on the regional economy as the Lynnwood Link. While we question this conclusion we note that the impacts on the local economy are much more significant. The OMSF does not offer realistic TOD benefits to Lynnwood or support for City Center development in the way Lynnwood Link can (depending upon the route alternative that is selected). The employment benefits are unlikely to accrue locally. In fact, in OMSF, as an inappropriately located heavy industrial use, creates much more significant negative cumulative impacts for the City and our residents and businesses.

39. Figure 4.4-4c Social Impacts, Community Facilities Within 0.5 Mile of Light Rail Alternatives, P. 4-55: The DEIS fails to consider significant community facilities in Lynnwood.
Cedar Valley Grange
Area of Potential Impact is described as the geographic area within which an undertaking may directly or indirectly cause alterations to the character or use of a historic property. The Cedar Valley Grange (Originally Hall Lake Grange and founded in 1909) was moved to its present location in 1948. Although the building exterior has been remodeled, it is the oldest social organization in the Lynnwood area still in existence with the early rosters

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 10 of 16

considered the City's comments as well as other design updates and the Final EIS revisits the TOD assessment performed for the Draft EIS.

L-004-036

Sound Transit has considered the comments by the City and others and has updated the text for the Final EIS to remove the incorrect reference to the hotel property. The text also now references the City's concerns about impacts to the densely zoned block. However, Sound Transit's conclusions in the EIS regarding the potential for overall land use impacts of the alternative remains similar to the characterization in the Draft EIS. Alternative C3 would not preclude all development on the block, and its other land use impacts are less than the impacts of either Alternative C1 or C2 because it avoids properties along 52nd Avenue and south of 200th Street SW.

TOD potential was one of the aspects of land use change considered in the Draft EIS, but existing uses, land use patterns, adopted plans and policies, and future planned uses are all considered. The City's comment characterizing the Alternative C3 station location as remote overstates the differences in the location of the alternatives and their proximity to other uses, as well as related benefits, but the modified Alternative C3 Sound Transit has developed in coordination with the City does place the station location closer to the city center core.

L-004-037

Section 4.3.2 of the Draft EIS evaluated the direct impacts to one business that would need to be acquired and displaced under Alternative C3. In the Final EIS, the Preferred Alternative modifies Alternative C3 by minimizing the amount of acquisition required within the triangular block east of 44th Avenue West, north of Interstate 5, and south of Alderwood Mall Boulevard. This area has been identified by the City of Lynnwood as an area planned for future high-density development. Alternative C3 Modified, designed with input from the City of Lynnwood, places the tail

L-004-040

including many of the pioneer families. It would be considered eligible for the Lynnwood Register of Historic Landmarks by age and by its exemplifying the cultural, social, or historic heritage of the City. The evaluation of buildings considered "historic" in the report focused on building structures, rather than the role which the buildings and their occupants played in the area history.

To be eligible for registration on the National Register of Historic Places (NRHP), it must meet one of four criteria including the following: "A. That are associated with events that have made a significant contribution to the broad pattern of our history...". Given the role the Grange played in the history of Alderwood Manor and later the City of Lynnwood, it should be considered eligible for the Register. Once a historic resource is identified and evaluated, Criteria of Adverse Effects are applied which include alteration of the property' setting and the introduction of visual, audible, or atmospheric elements that are out of character with the historic property.

Given its location within the 200 foot Area of Potential Impact Zone, the Cedar Valley Grange should be considered subject to an Area of Potential Effect. While the Grange building may not be directly impacted by the construction of Routes C1 and C2 with little impact created by noise and vibration, long-term effects will continue as the proposal is in operation which will impact the site's visual effects, integrity of setting, feeling and association with the surrounding community. Certainly, the OMSF, which is a heavy industrial use that would be located directly across the street from the Grange, would have a significant impact.

Interurban Railway

Although the Interurban Railway has been determined from the scope of this project not to be eligible for NHRP listing, it played a significant role in the shaping of the Alderwood Manor/City of Lynnwood community. In Part 2, Page 8-2, of the Cultural, Archaeological, and Historic Resources Technical Report, no detailed mention is made of the routing of the Interurban (though details are provided for the King County portion of the railway) and its impact on Lynnwood and the surrounding Snohomish County communities. Mention should be made that while both Routes C1 and C2 will impact the route of the railway by crossing over it, Route C3 has a major impact on the aesthetic, noise and visual aspects of the Interurban, with the line paralleling the route of the Railway for between a quarter to a half mile.

Hall's Lake

Although the Hall's Lake and the Hall's Lake Church Camp have been determined from the scope of this project not to be eligible for NHRP listing, activities associated with them played a significant role in the shaping of the Alderwood Manor/City of Lynnwood. Besides being the location of the camp, Halls Lake featured a saw mill which milled much of the timber logged during the early development of the community. Route C3 crosses a corner of the property associated with the site and one building with ties to the camp may be removed adjacent to 54th Avenue W.

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 11 of 16

track adjacent to and immediately south of Alderwood Mall Boulevard without bisecting the triangular block. The realignment of the tail track minimizes impacts to future redevelopment of parcels within this triangular block by minimizing acquisitions. The revenue potential related to future redevelopment has not been analyzed in the EIS due to the speculative nature of the size, type, and timing of future development. Any future extension of the Link light rail system north of Lynnwood could continue from the tail track section while paralleling Alderwood Mall Boulevard, also minimizing impacts to revenue potential.

L-004-038

Although the Draft EIS noted that the impacts would be higher, the Final EIS has been revised to note that the construction of the two projects could be sequential and extend the duration and severity of the impacts.

L-004-039

Section 4.3.5 of the Final EIS has been revised to state that "the Link Operations and Maintenance Satellite Facility and the larger transportation projects would have similar or greater capital construction expenditures and construction multiplier effects on the regional economy..."

Section 4.3.5 of the Draft EIS does acknowledge that the Link Operations and Maintenance Satellite Facility would also displace some of the opportunities for increased development and redevelopment potential adjacent to stations. Section 4.3.5 of the Draft EIS also acknowledges the potential loss of additional property tax revenue to the City of Lynnwood due to the construction of the Lynnwood Link Extension and the Link Operations and Maintenance Satellite Facility Project.

Increased long-term employment at the Link Operations and Maintenance Satellite Facility during operation would be quantified as

L-004-040	In summary, the construction of Routes C1, C2, and C3 will have an impact on historic resources associated with the Alderwood Manor/Lynnwood community, especially Cedar Valley Grange and the Interurban Railway route. We ask that these impacts be analyzed and mitigation proposed as appropriate. We also request that in the design for the station, consideration be given to the construction of displays that highlight the historic resources that have been impacted.
L-004-041	40. 4.4.2 Social Impacts, Long Term Impacts, page 4-59: Segment C analysis contains previously mentioned errors regarding impacts from C3 and failure to consider ST3 extensions under any alignment.
L-004-042	41. 4.4.4 Social Impacts, Indirect and Secondary, P. 4-61: The following statement conflicts with the outcome of Table 4.2.3 for TOD potential. Lynnwood's overall TOD potential should be as stated in comments above. "Construction of the light rail transit facilities could influence real-estate market forces that could increase the potential for transit-oriented development at some station locations as permitted by local zoning regulations. Such changes may be greater in the Lynnwood City Center neighborhood, where transit-oriented development potential is most likely, but most of the immediately surrounding area is characterized by commercial, light industrial, or parking uses. See Section 4.2.2 in Section 4.2, Land Use, for a discussion of long-term changes in land use. Moderate levels of redevelopment may occur in station areas in Mountlake Terrace and Shoreline." This text contradicts Lynnwood's overall TOD potential in Table 4.2-3 equaling Mountlake Terrace Transit Center Station.
L-004-043	42. Table 4.5-1, Visual Impacts, Potential Visual Impacts, P. 4-82: Alternative C3 in the 44 th Ave W corridor is a high impact (not low to medium) to the existing commercial and planned high density mixed use that can accommodate multi-family residential growth.
	43. 4.5.4 Visual Impacts, Indirect and Secondary Impacts, Page 4-89: Landscaping is not adequate for the tail track C3 mitigation running through a high density zone to support City Center redevelopment plans including multifamily.
	44. 4.5.5 Visual Impacts, Cumulative Impacts, P. 4-89, 4-90: Add similar language as Northgate above in this section for Lynnwood City Center redevelopment plans.
	45. 4.5.6 Visual Impacts, Table 4.5-2 Potential Mitigation Measures, , P. 4-93: We note that Sound Transit is proposing establishing a landscape screen near homes located along the west side of 52 nd Ave under the C1/ C2 alignment options. This is an excellent idea since landscaping proximate to the track structure is unlikely to be effective in buffering the homes due to their proximity and topography. ST should consider the potential for building earthen berms and planting coniferous trees long it to improve effectiveness. Add 200 th to relocated streets (potential widening) and Landscape Screen for 44 th as C1 and C2 have the tail track against boulevard, for visual impact in City Center.

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 12 of 16

part of the separate NEPA/SEPA analysis being performed for that project.

L-004-040

The Final EIS evaluates potential adverse impacts on the Cedar Valley Grange Hall and the Interurban Railway. The Cedar Valley Grange Hall was added to Figure 4.4-4C, Community Facilities Within 0.5 Mile of Light Rail Alternatives. The Hall Lake Church Camp was not evaluated because it is not an existing community facility. In order to be eligible for listing in the National Register of Historic Places, a property must meet one of several criteria and possess integrity of location, design, setting, materials, workmanship, feeling and association. The Cedar Valley Grange Hall lacks integrity of location, setting, design, materials and feeling. It has been altered with a prominent front entry addition, which changes the design, as well as replacement cladding and window sash made of modern materials. Its setting and location have also been changed. Therefore, FTA determined, and the State Historic Preservation Officer (SHPO) concurred, that it is not eligible for listing in the NRHP. The *Cultural, Archaeological, and Historic Resources Technical Report* notes that this property has an historic importance to the City of Lynnwood. Due to the local importance of the Cedar Valley Grange, Section 4.4.2 of the Final EIS was revised to evaluate potential impacts to this community facility, but concludes it will not be affected by the proposed light rail project.

The Interurban Trail is evaluated for historic significance in the Final EIS, but the analysis determined it lacks integrity of design, materials, workmanship and feeling. It is a paved bicycle and pedestrian trail that retains none of the elements of its original use, such as rails, ties, concrete abutments or other related facilities. Therefore, the trail does not convey the historic significance of the rail line. Accordingly, FTA determined, and the SHPO concurred, that the trail is not eligible for listing in the NRHP. Due to its importance in the community, Section 4.4

L-004-043	46. 4.7.3 Noise and Vibration, Alt C3 Noise Impacts, P.4-121: No analysis of the tail track turnaround noise impact on hotels and properties. Hotels adjacent may have impacts to guests staying overnight and impacts for TOD potential mixed use. A church use is identified for C1, so including analysis of these impacts for C3 would be consistent.
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L-004-044	47. 4.7.6 Noise and Vibration, Cumulative Impacts, P. 4-124 states that "Because Sound Transit is mitigating all noise and vibration impacts (as defined by exceeding applicable FTA, state, or local criteria) created by the project, the project would not increase cumulative noise or vibration impacts, considering other current or future actions in the project area." Future actions as described here should include currently adopted City Center Sub-Area Plan within the PSRC designated Regional Growth Center to accommodate high density residential and commercial uses. C3 tail track impacts on this future action are not currently considered in the EIS and need to be.
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L-004-045	48. 4.7 Noise and Vibration, Cumulative Impacts, Page 4-126: The DEIS appears to accurately portray the potential for noise impacts to homes under each of the C track alignments. It then states that "Noise impacts <u>could</u> be mitigated by a 4-6' tall barrier" along the tracks. The City is seeking confirmation that these noise barriers <u>will</u> be designed into the project.
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L-004-046	49. 4.8.1 Affected Environment: This section does not include a discussion of fauna that use the C-Segment sites, but may not be listed under ESA. Species may be impacted that have local significance, including birds and mammals (for example - river otters frequently use Scriber Creek and regional wetland). Disruption to these species would have significant emotional impact for locals who take enjoyment in viewing opportunities. This should be acknowledged and the impact assessed.
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	50. 4.8.2 Long Term Impacts: Impacts to Scriber Creek are understated. Scriber is definitively channelized, contrary to statements made otherwise (particularly as it relates to C-2). This area frequently experiences flooding, backing-up, and flooding of properties immediately upstream. Any activity which may impede capacity, or affect our ability to maintain the channel must be acknowledged and avoided.
	51. 4.8.2 Long Term Impacts: There is no discussion of the impact of lighting and noise on the wetland affected by the C-segments. Increased light and noise directly over the Scriber Regional Wetland will impact animal use (particularly nocturnal animals – beaver and raccoons), and nesting birds. Predation of aquatic animals will increase as aquatic visibility increases. Noise and vibration may push out resident mammals (such as the river otters, or beavers) into surrounding areas.
	52. 4.8.5 Ecosystem Resources, Cumulative Impacts, Page 4-144: states potential impacts of school district's administrative facility, and 4.15.4 on page 4-196 states the indirect and cumulative impacts of the School District facility as the same as the OMSF, please remove as

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 13 of 16

Social Impacts, Community Facilities, and Neighborhoods and Section 4.17 Parks and Recreation Resources evaluate potential adverse impacts on the Interurban Trail.

At Hall Lake, no remnant of the saw mill that was originally at this site remains. There are several small houses that may be related to the Church of the Nazarene's Hall Lake camp. However, all of these buildings have been altered and they no longer retain integrity of design, materials and workmanship. For this reason, FTA determined, and the SHPO concurred, that the buildings are not eligible for listing in the NRHP. The *Cultural, Archaeological, and Historic Resources Technical Report* notes that this property has an historic importance to the City of Lynnwood. Due to this local importance, Section 4.4.2 of the Final EIS was revised to evaluate impacts on the lake and concludes the lake will not be affected by the proposed light rail.

As discussed in Section 4.5, Sound Transit will develop design criteria for light rail stations featuring a consistent architectural theme that could include details related a community's settlement, historic resources, or nearby community facilities. Preliminary concepts for station designs will be developed with input from local jurisdictions and WSDOT, and will be vetted with the public. Sound Transit's station design standards will promote visual unity in the station areas.

L-004-041

The discussion of potential long-term impacts (Section 4.4.2) and construction impacts (Section 4.4.3) was expanded to provide more detail on impacts to parklands under each of the three Segment C alternatives. The comment indicates that the discussion of long-term impacts in Section 4.4.2 should have addressed impacts of the ST3 extension. Such impacts would not be directly related to improvements proposed for the Lynnwood Link Extension, because the ST3 extension is a separate project that is independent of improvements associated

L-004-046	their project is not relative to the Lynnwood Link and this is conjecture, how can ST determine that an administrative building with a bus lot, will draw the same power/ water etc. as the OMSF?
L-004-047	53. 4.9.1 Water Resources Affected Environment: Scriber Creek is in the Swamp Creek Basin (Scriber is the largest tributary and contributing area in Swamp Creek), which is listed on the 303(d) list for numerous pollutants. There is an active TMDL for bacteria currently under implementation.
	54. 4.5.5 Cumulative Impacts: The statement "rainwater would be intercepted by the non-pollution-generating guideway rather than the pollution-generating roadway" thereby converting PGIS surface to NPGIS - is not accurate and should be stricken from the document.
L-004-048	55. 4.11.3 Construction Impacts: It is unclear why dewatering is not anticipated nor addressed, particularly for the C Segments, given the localized high perched groundwater table, necessary crossing of a wetland, saturated peat soils, and excavation necessary for installation of water quality / quantity treatment facilities (only the shaft foundations were considered in the analysis). Dewatering will be necessary for construction in this area.
L-004-049	56. 4.15: Alternative C-3 directly impacts City of Lynnwood Wastewater Pump Station #10. At the very least there would be impacts during construction, if not permanent. Mitigation / contingencies should be addressed.
L-004-050	57. 4.16.1 Historic Buildings and Structures: Refer to comments above dealing with the Grange building, Interurban Railway and Halls Lake.
L-004-051	58. 5.1 Evaluation of Alternatives, Ability to Meet Purpose and Need, P. 5-2: states "In the project corridor, the major urban growth centers are at Lynnwood and Northgate, which would be connected by light rail....Moreover, light rail can encourage future private development and investment near stations, which would result in economic benefits that would support the region's economic development plans." The 5.2 summary and section 5.1 are clear that included in the purposes and needs is to support redevelopment of Regional Growth Centers of which Lynnwood is the only one served by this project. The July 2013 Transportation Technical Report page 4-100 inventories existing nearby parking on generally underdeveloped private parcels located in the City Center. As mentioned earlier, Sound Transit cannot undersize their parking facility and utilize the existing spaces off premises from the transit center for its parking utilization as this runs counter to the ability to meet the purpose and need encouraging redevelopment and accommodating growth.

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 14 of 16

with the Lynnwood Link Extension. As such, discussions of these potential impacts should not be addressed in Section 4.4.2, Long-Term Impacts. However, Section 4.4.5, Cumulative Impacts, has been revised to incorporate additional discussion addressing these potential impacts. Additional discussion of potential cumulative impacts associated with the ST3 extension was also included for each of the elements of the environment discussed in Chapter 4 of the Final EIS. The comment indicates there is inconsistent discussion of potential environmental impacts in Section 4.2.4, Land Use and Section 4.4.4, Social Impacts, Community Facilities, and Neighborhoods regarding the potential for transit-oriented development to occur around the proposed transit stations. The text in Section 4.4.4 was revised to be consistent with language in Section 4.2.4 and reflect that the overall TOD potential in the Lynnwood Transit Center Station area would be strong compared to moderate to strong in the Mountlake Terrace Station area and limited for the station areas in Shoreline and north Seattle.

L-004-042

42. Table 4-5-1, Alternative C3. The City commented that the impact should be "high" for the existing commercial and planned high intensity mixed use, including multi-family. No change in the low to medium rating is proposed. The existing low visual quality rating on page 4-72 is based on the City's description of the area in the City Center Subarea Plan as "the dominant visual image is wide barren streets, enormous parking lots, signs and strip shopping centers. There is no sense of a center..." and "the general atmosphere is chaotic, congested and devoid of any character ..." The low impact rating is based on a change from the existing condition. A moderate impact rating is based on consideration of the future character of high intensity development provided for in the subarea plan and zoning. The projected intensity of development with Floor Area Ratios of 8-10 in the core and 3-5 outside of the core and building height in the core of 15 to 34 stories and 5 to 13 stories outside, will render the scale of the proposed elevated light rail system in

L-004-051 59. As the northern terminus and the only Regional Growth Center in this project, Lynnwood
2 will accommodate the highest number of daily boardings in the Lynnwood Link Extension. In
3 order to increase qualifications under New Starts funding criteria and meet Sound Transit's
4 TOD policies, Sound Transit should: Provide increased analysis for C3 tail track impacts
5 related to these purpose and need statements and New Starts funding criteria (below); and
6 Work with the development community to implement its TOD policies consistent with New
7 Starts objectives to accommodate shared use parking with private redevelopment,
8 wherever possible.
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L-004-052 60. Table 5-4, Evaluation of Alternatives, Comparison of Segment C Alternatives, P. 5-10:
11 Based upon previous discussions regarding errors in property takes under the C3 alignment,
12 the information presented in the property and total cost is erroneous and should be
13 revised. Based upon the previous discussion on TOD potential, the information presented is
14 erroneous and should be revised. Based upon previous discussions on ST2 alignments
15 direct and immutable impact to Lynnwood City Center Plans and redevelopment potential,
16 a column illustrating ST3 extension impacts on the block east of 44th Ave needs to be added.

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Alternative C3 a relatively minor element within a complex and diverse urban setting.

43. Visual Impacts, Indirect and Secondary Impacts, page 4-89. The City commented that landscaping is not adequate for the tail track in Alternative C3 for mitigation of impacts to a high density zone. As indicated above, the light rail elevated system is anticipated to be just one element of a very high intensity and diverse setting. The reference to landscaping on page 4-89 is in reference to light rail stations providing a focus for mixed use development with landscaping and other visual amenities developed as an integrated part of the new developments.

44. Visual Impacts, Cumulative Impacts, pages 4-89 to 90. The City requested language similar to Northgate. Additional discussion of the intensity and scale of planned mixed use development in the Lynnwood City Center has been added to the Final EIS.

45. Visual Impacts, Potential Mitigation Measures, page 4-93. The City supports landscaping near homes along 52nd Avenue and suggest consideration of earthen berms, coniferous trees, and landscaping for 200th Street and 44th Avenue. The discussion of landscaping on pages 4-91 to 4-93 includes concepts that may be applied as designs are further developed. The text notes that it may take 15 to 20 years for plants to grow large enough to screen large facilities and 30 to 50 years to provide the same functions as existing mature vegetation.

L-004-043

46. 4.7.3 Noise and Vibration. Sound Transit analyzed the properties along the tail tracks in the Draft EIS. Although the hotel property is considered an FTA land use category 2 for noise impact analysis, the noise analysis does not indicate that there will be impacts significant enough to require specific mitigation at that location. See the Draft EIS Section 4.7.3 for the discussion on operational impacts of the project.

Impacts along the tail tracks are not likely due to the slow speed of the train on the trail tracks. If impacts are identified, noise walls would be considered as the primary form of mitigation.

47. 4.7.6 Noise and Vibration. See above response to comment #46 on the tail track. For permitted/approved developments with sensitive uses, Sound Transit performed an analysis as if the property were in place and considered mitigation where impacts were identified. Areas that are zoned for mixed uses but with no permitted or approved developments were evaluated based on their existing use. For the Final EIS, Sound Transit's updates included a review of permitted developments.

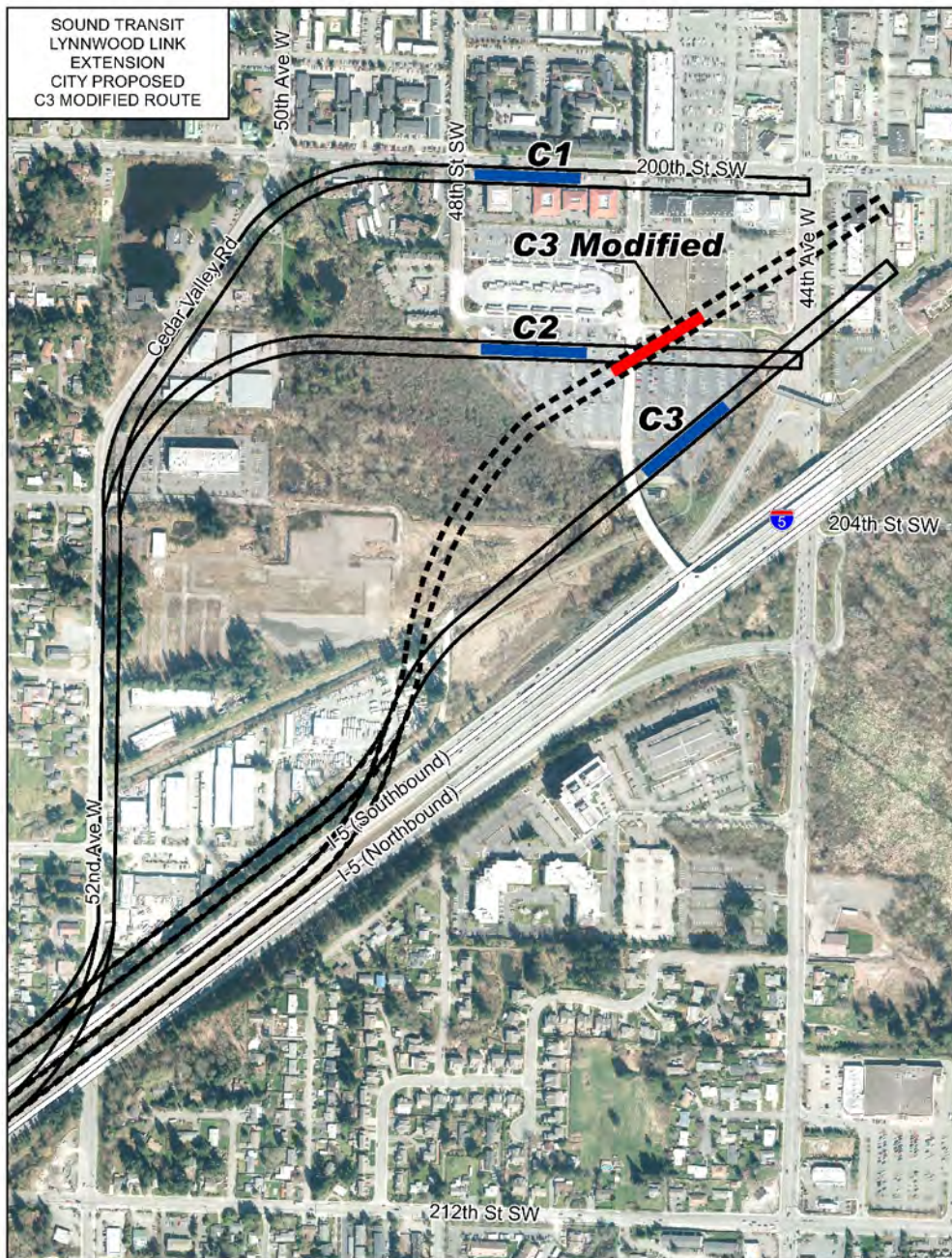
L-004-044

Any noise mitigation measures that are necessary for compliance with the FTA and Sound Transit's Mitigation Policy will be part of the Record of Decision and therefore will be included in the project when constructed.

L-004-045

49. 4.8.1 Affected Environment. The description of the affected environment has been expanded to include more information about wildlife use of the Scriber Creek wetland complex. More detailed information about vegetation and wildlife resources in the study area can be found in the Ecosystem Resources Technical Report. Potential effects related to wildlife viewing opportunities are discussed on page 4-220 of the Draft EIS, in the analysis of effects on Parks and Recreational Resources.

50. 4.8.2 Long Term Impacts. Potential impacts related to changes in the flood storage capacity of the Scriber Creek floodplain are discussed on page 4-156 of the Draft EIS, in the analysis of effects on Water Resources. Potential impacts to the stream channel will be addressed



through the various local, state, and federal permitting processes for this project. For those permits, the stream area that may be impacted by the Preferred Alternative will be identified by delineating the ordinary high water mark (OHWM) of the stream. In low-gradient streams with multiple channels (such as Scriber Creek within the wetland complex in the study area), the OHWM typically encompasses a greater area than the bankfull stream channel. In other words, impacts within the OHWM represent a conservative estimate of stream channel impacts. The impact analyses in the Final EIS reflect the results of these delineations.

51. 4.8.2 Long Term Impacts. Discussions of potential long-term impacts of lighting and noise on wildlife appear on pages 4-135 and 4-136 of the Draft EIS. The analysis in the Final EIS includes additional information about potential effects related to changes in the amounts of noise, lighting, and human activity in the study area, including the Scriber Creek wetland complex.

L-004-046

Section 4.8.5 (page 4-144) of the Draft EIS states that Sound Transit is considering a Link Operations and Maintenance Satellite Facility in the same area as the Edmonds School District master plan. It also states that one or both of these projects may include loss or degradation of vegetation, wildlife habitat, streams, wetlands, and associated buffers. The Ecosystem Resources and Utilities sections do not state that the potential impacts are the same.

L-004-047

53. 4.9.1 Water Resources Affected Environment. The scope of this study focuses only on Scriber Creek because it is located within the proposed project footprint. A brief discussion of the system downstream of Scriber Creek, which includes Swamp Creek, is included for context only. The project would not discharge within the Swamp Creek TMDLs regulated reach; therefore, discussion of its TMDL is beyond the scope

of this study.

54. 4.5.5 Cumulative Impacts (assuming comment pertains to 4.9.2 Water Resources Long-Term Impacts). The language in the Final EIS will be updated to clarify that the proposed project would result in more stormwater runoff generated by non-pollution-generating surfaces and less generated by pollution-generating surfaces compared to the existing condition.

L-004-048

Shaft foundations for Segment C will be completed using cased drilling techniques and methods for placing concrete without the need for dewatering.

Detention facilities are planned in Segment C. If possible, they will be designed to be above the water table. If this is not feasible, dewatering would be necessary for construction of these facilities. The water removed from the excavations would be handled according to the guidelines specified by Washington State Department of Ecology (Stormwater Management Manual for Western Washington).

Section 4.11.3 of the Draft EIS notes that if dewatering is required, methods to reduce settlement from dewatering could include using localized dewatering, reinjecting groundwater, using sheet piles for groundwater cutoff, or underpinning nearby structures.

L-004-049

The Final EIS discussion of impacts related to the pump station has been updated; Sound Transit appreciates the additional detail on the City's expansion plans.

L-004-050

Please see response to comment L-004-040 above.

L-004-051

Although parking is an important component of the access plan for the Lynnwood Transit Center Station, the project's ability to meet the purpose and need does not rest solely on providing parking at levels that might satisfy unconstrained demand. The project would continue to provide speed and reliability benefits to travelers, and it would also encourage higher density development in the surrounding area, which would encourage more biking and walking to reach transit. Community Transit and Sound Transit would also continue to develop and expand service in the area, which could further reduce reliance on the automobile. Sound Transit believes the Draft EIS evaluation of alternatives continued to convey the primary factors distinguishing the alternatives.

Sound Transit will be applying to FTA for New Starts funding and will comply with the August 2013 New Starts and Small Starts Evaluation Rating and Process Final Policy Guidance. Two project justification criteria are related to TOD: economic development effects and land use. Sound Transit will follow FTA's guidance to prepare and submit the required documentation. This effort is not part of the EIS process.

L-004-052

The information regarding property acquisitions in the table of the Draft EIS was accurate. The City has identified an error in Section 4.2 (Land Use) of the Draft EIS that misnamed a single property, but all of the other discussions about properties impacted, including displacements of businesses and employees, were accurate. However, the evaluation has been updated for the Final EIS to specifically note the City's concerns about impacts to the block east of 44th Avenue.

EXECUTIVE

September, 19, 2013

Joni Earl Chief Executive Officer
Central Puget Sound Regional Transit Authority
401 Jackson St.
Seattle WA 98104-2826

RE: Lynnwood Link DEIS, Public Comments

Dear Ms. Earl,

First let me again thank you for agreeing to my request that Sound Transit extend the comment period for the Lynnwood Link DEIS.

Lynnwood used the extended time to conduct extensive outreach efforts with our residents and business community. We held three forums for residents and businesses, two in June and a third on Saturday September 14th. Each of our meetings was extremely well attended. People were encouraged during the first two forums to offer their comments directly to Sound Transit and when appropriate through the DEIS website.

Also, at our regular Business Meeting on September 9, 2013, we received "open microphone" comments on ST2 and received three written submissions.

At last weekend's meeting we received a large number of comments which the City summarized on easels, as well as written statements which were submitted. We also received one follow-up email on Monday September 16, 2013, from Linda Willemarek. I am forwarding these to you to insure that they are included in the official record and considered by Sound Transit during the DEIS process.

Therefore, the following items are attached:

1. Citizen comments – Business Meeting September 9, 2013, 3 pages,
2. Sound Transit Community Outreach Meeting: Saturday, September 14, 2013 Notes Taken From Citizen Comments, 10 pages,
3. Email Monday, September 16 2013, 1 page.

In regard to the September 16th email, we concur with Ms. Willemarek's request for a more detailed review of properties in the Conservation Futures Program (CFP), and believe that the detail work will need to be accomplished by Sound Transit to appropriately complete its Environmental Impact Statement process. It would seem appropriate for Sound Transit to follow-

L-005-001

Sound Transit appreciates the City's efforts to engage the community in reviewing the alternatives under consideration.

L-005-002

For the Final EIS, Sound Transit has examined the properties acquired through the Conservation Futures program. If Sound Transit were to proceed with the conversion of part of a property purchased through the program, the agency would meet the replacement requirements as part of its acquisition process.

L-005-001

L-005-002



L-005-002

up with the Snohomish County Conservation Futures Program in regard to property and/or title encumbrances, stipulations, and associated program limitations on the properties. Also, Sound Transit should follow-up with Snohomish County concerning prosecuting attorney legal opinions as to use of CFP properties.

Please convey my appreciation to Board member Paul Roberts, Patrice Hardy, Matt Sheldon, Michelle Ginder and others who helped support our City's outreach efforts.

Sincerely

A handwritten signature in black ink, appearing to read 'Don Gough'. The signature is fluid and cursive, with a large, sweeping 'D' and a long, trailing flourish.

Don Gough

Mayor, City of Lynnwood

CC: Sound Transit Board
Steve Kennedy, Sound Transit Staff
Lynnwood City Council

Attachments

Sound Transit Community Outreach Meeting: Saturday, September 14, 2013
Notes Taken From Citizen Comments

L-005-003

1 **C1:**

- 2 • Wetlands issue and protection of animals: why can Sound Transit disturb the wetlands if
- 3 the normal citizen cannot.
- 4 • Impacts to quality of life to people, financial impacts to businesses, business relocation,
- 5 park and wetland issues.
- 6 • Disturbing this land could cause geological issues
- 7 • Traffic impacts
- 8 • Home values will decrease and cause decreased tax revenues for the city.
- 9 • Getting a light rail station will be positive: some home values will increase due to
- 10 proximity to the light rail / accessibility of transportation options
- 11 • Noise, vibration, aesthetics: not compatible with the neighborhood
- 12 • The park was purchased with County Conservation Funds. It is federally protected land
- 13 unless development is "unavoidable" but is it really "unavoidable"?
- 14 • Destroys the neighborhood along the route
- 15 • 77 multifamily residents will be displaced and there is no plan to assist them with
- 16 relocation
- 17 • Traffic increased on 200th St – this street is already impacted by traffic
- 18 • Cedar Valley Road is not an industrial area, there are professional businesses located
- 19 there and it is disrupting their business: loss of parking for businesses, construction
- 20 mess
- 21 • It lacks common sense due to the displacement of residents and businesses
- 22 • Not a walkability issue, people won't walk regardless of how far the station is. This option
- 23 displaces people, businesses, parks, and increases noise
- 24 • Retention pond mitigation?
- 25 • Proximity to residents, construction impacts
- 26 • City should be the ones to determine the pros and cons based on City Center plans

27 **C2:**

- 28 • Park, wetlands, wildlife will experience a direct impact
- 29 • Increased crime: drug dealers, gangs
- 30 • Visual, aesthetics
- 31 • Transit increases foot traffic to small businesses
- 32 • Impact / disruption to the Interurban Trail
- 33 • Businesses impacts: displacement, loss of professional jobs (100+ employees)
- 34 • Negative impact on homes, parks, businesses, attracting visitors; loss tax revenue from
- 35 displaced residents, infrastructure of the routes are impactful (pillars)
- 36 • How does the city replace the lost tax revenue from displaced residents and
- 37 businesses?
- 38 • The numbers of impacted businesses in the DEIS only takes into account those that are
- 39 displaced, not those that will be negatively affected by construction, loss of parking, etc.
- 40 • Curves in the route can cause wear and tear on the equipment.

L-005-003

Sound Transit appreciates the summary of comment issues raised regarding Segment C Alternatives during the City's forums; these are similar to the comments Sound Transit formally received during the scoping period. Chapter 7 of the Final EIS summarizes common comments and responses. Responses to comments from individual parties that submitted remarks to Sound Transit on the Draft EIS are provided in the Final EIS Appendix P.

Sound Transit Community Outreach Meeting: Saturday, September 14, 2013
Notes Taken From Citizen Comments

L-005-003

- 1 **C3:**
- 2 • This is positive because it creates a transit node
 - 3 • Impacts park, wildlife, wetlands
 - 4 • This option but move it a little closer to the freeway to create a multi-nodal transit center.
 - 5 Can you direct traffic to 206th instead of 200th?
 - 6 • Would upgrades to the lift station and the retention ponds be charged to Sound Transit?
 - 7 • Flooding issues are a problem
 - 8 • This option is less invasive to residents
 - 9 • This will help us get to Seattle faster, it is less impact to the wetlands and park, and it
 - 10 clumps transit together
 - 11 • Sound Transit needs to research the impacts of this route more
 - 12 • Seems like a funny place for the elevated line (where it crosses I-5 ramp)
 - 13 • This option is too far between transit connections: you need a simple path between bus
 - 14 and train for the access of the riders
- 15 **General Comments:**
- 16 • The route should follow along I-5 and the freeway ramp
 - 17 • Has C4 been researched for the impact on the neighborhood?
 - 18 • How will the line continue to Everett?
 - 19 • Taking the route up I-5 would miss the wetlands and not impact residents
 - 20 • Can the City ask Sound Transit to specify the most stringent environmental impacts in
 - 21 regards to protection of the park, trees, root lines, etc.
 - 22 • C4 is the best option out of the 4
 - 23 • Should have the station at Alderwood with a stop at the Transit Center
 - 24 • These station options aren't close to the types of businesses that you'd walk to, it should
 - 25 be located at Alderwood Mall
 - 26 • Can we get an extension to the 60 day comment period? There are unanswered
 - 27 questions: EPA site visit
 - 28 • Concerned about the errors in the DEIS.
 - 29 • Should use the old Lynnwood High School location as the station or utilize the 'Texas T'
 - 30 on ramp.
 - 31 • How viable is C4? It seems to be the best option
 - 32 • Select a route with the least impact to residents and businesses.
 - 33 • Go to Alderwood Mall, there will be less crime than if it is brought to a neighborhood.
 - 34 • Additional parking at the Transit Center is needed
 - 35 • Embassy Suites has had major issues in regards to the wetlands that were very costly,
 - 36 we need to avoid that.
 - 37 • We should keep Light Rail with the Transit Center
 - 38 • Should have multiple stops in Lynnwood
 - 39 • Bus routes have been cut back the past few years – this won't help reduce car trips
 - 40 • People will still have to drive to the station

2 of 3

Sound Transit Community Outreach Meeting: Saturday, September 14, 2013
Notes Taken From Citizen Comments

L-005-003

- 1 • Relocating to Alderwood Mall would negatively impact those businesses
- 2 • Developing on wetlands is not safe
- 3 • Traffic impacts on 200th St and 196th St
- 4 • All lines turn Lynnwood into an industrialized area
- 5 • Any disruption of the wetlands and Scriber Lake Park are bad
- 6 • All routes would increase crime: drug dealers, gangs
- 7 • Can we tunnel instead of raised or ground level routes?
- 8 • C3/C4 don't devastate the neighborhoods
- 9 • Why doesn't the route stay on I-5
- 10 • All routes impact low income residents and seniors as well as parks
- 11 • New routes should be created that benefit the Lynnwood community – not impact it
- 12 • All routes stand to impact the wetlands
- 13 • Mitigate traffic and amount of parking paces
- 14 • What impacts will the Lynnwood to Everett line create?
- 15 • All routes don't take into account future growth and planning: City Center, Everett
- 16 extension.

This was meant to be presented as a ^{formal} speech in front of the City of Lynnwood Council.

L-005-003

I would like to thank the city council for allowing me to speak and thank everyone for showing up to support their neighbors, as well as, voice their concerns and opinions on this subject of the Lynnwood Light Rail Alignments.

That autumn evening the air was still and silent as I walked through the park like I always did time and time before. Many of the trees had turned into festive colors of greens, reds, yellows and oranges. A father and his young daughter, she must have been only 5 or 6 years old strolled ahead of me and a mysterious and sudden gust of wind blew through the trees carrying the smells of pine through the crisp air. A sudden shriek forced its way out among the tall evergreens and pines as I stopped and watched with amazement as a large gray owl emerged from the tall green trees and flew towards the child and her father, she pointed and said, "Daddy, did you see that!" with large eyes and in complete astonishment. The father seemed to look like a child himself having larger eyes than his daughter and looked amazed and stunned and said, "Wow!" The owl cruised over my head and disappeared with a screech into the nearby trees behind me. At that moment I felt so incredibly blessed. I have always known that our neighborhood in Lynnwood was special almost sacred. In my almost 40 years of living and growing up in South Lynnwood this was the first time of having the experience of seeing an owl. I have heard them screeching from time to time in nearby tree lines close to our house, but never seen the nocturnal bird. How fortunate we are to live in a city where nature is so close. That is why I find it so hard to believe that the alignments C1 and C2 for the Light Rail are even being considered. These two alignments are intrusive and destructive in what I and others thought was a protected habitat and sanctuary for a vulnerable ecosystem of plants and animals. We in this community as

L-005-003

He is a voice for those who can't speak for themselves

well as the city have a greater responsibility to conserve and protect this habitat and sanctuary that is home for canadian geese, wood ducks, bald eagles, owls, herons, blue jays, beavers, river otters, raccoons, possum, frogs, salamanders, bats, turtles and list is really endless with so many species not to mention all the varieties of trees and vegetation that hide and protect these creatures.

I urge the City of Lynnwood Council to back the citizens that live and work in the path or near the alignments of C1 and C2. I live near both alignments and I fully support the C3 alignment because it has less of an negative impact on our primarily residential neighborhood and does not take out a large part of the park and wetlands.

I would also like to encourage everyone this autumn to tune back into nature and take a walk in the Scriber Creek Park so that you might experience a Wow! moment. This could possibly be your last opportunity to do so before it's all gone.

Thank you city council and everyone who showed up today.

*Tricia Monaghan
5214 201st Pl S.W.
Lynnwood, WA 98036*

Thoughts and Concerns on Sound
Transit Route Alignments for the Community
Outreach Meeting
City of Lynnwood/Lynnwood Link Extension
Saturday, September 14th, 2013
By Mary Monaghan

L-005-003

Yes, we need light rail to Lynnwood. But at what cost to the residents who live here. It is quite obvious to me that C3 is the less intrusive and has fewer impacts to our neighborhood and to the Cedar Valley community.

It has come to my attention that the people in the Cedar Creek Condos and some of the businesses did not know of the light rail coming down 200th St. S.W. Our family has been fighting against the Operations Maintenance Satellite Facility and the light rail for a year. These people just recently found out that they are going to loose their homes and businesses if C1 is chosen as the route and they found this out by letter. We tried to let these people know a year ago and left information at the Condos with the property manager and recently found out from some residents that they never received the information. It would seem that information was allegedly being withheld on purpose and none of these people ever received anything addressed directly to them about Sound Transit until this letter came out eight weeks ago about their property.

I am deeply concerned about all of the impacts this whole project will have to our wetlands and the visual and noise impacts to our neighborhood. Please put yourselves in our place. How would you like this 40ft elevated, massive, intrusive cement jungle, across the street from your home that you have lived in for over 40 yrs, a home that you have put your heart and soul into. It seems dangerous and so out of character for this wetland neighborhood.

Both C1 and C2 would feature design measures to avoid noise impacts, but the elevated guide ways would change views and alternative C3 would have the least effect on this neighborhood because it is largely adjacent or parallel to I-5.

We on 201st Pl. S.W. by Spragues Ponds and mini park will also be impacted visually by the skyline and loss of old growth vegetation and trees in the Scriber Creek Park area along 52nd and 200th St. S.W. There is no way Sound Transit can give all of this back after the construction. These trees are old growth and a buffer to freeway and Park- and- ride noise. The light rail trains cannot have trees within 30ft of the rails. How can you expect us to embrace this massive cold and cruel cement jungle over old growth vegetation and trees and wetlands with cut throat trout, salmon spawning, turtles, dragon flies, butterflies, crickets, birds of all kinds including eagles, osprey, blue herons, wood ducks, Canadian geese, mallard ducks and river otters, raccoons, possum, musk rats, beaver, bats, salamanders, frogs and the serene sound of birds which have a calming effect rather than the stressful sounds of light rail. We had six turtles come down our street a month ago to lay eggs in the rocks in front of our house and across the street at our neighbors. How many people get to see that in their neighborhood? This is a protected wetland area labeled 4f and the sign on Scriber Creek Park sign says "Funded by in part by Conservative Futures Grant. Why would you want to put all of this wildlife in jeopardy and displace all of these animals? Why would you want something so massive going down 52nd and 200th and it will be only a block away from the so called Lynnwood City Center. Do you realize the trains will be running until 1:00 a.m. in the morning and then lined up at night on 200th and 44th waiting to be boarded again in the morning. Is this what you want

L-005-003

people to see when they come into Lynnwood? This is no way to beautify Lynnwood by making it look like the SODO district of Seattle. Keep it over by the freeway and out of our neighborhood and wetlands. Also, you could beautify your "Welcome to Lynnwood" sign a bit by putting seasonal plants and flowers in that space and do some weeding now and then. I'm sure you could even get some volunteers to help and maybe get some donations from nurseries in the area. Other towns have garden clubs that help beautify their city with hanging flower baskets like in Edmonds.

The elevated guideways on the eastside of 52nd would visually intrude upon the integrity and unity of the residential area. We happen to live in a very special area that many people don't realize exists here in Lynnwood. It is our little paradise of wetlands all in walking distance and I don't think the City of Lynnwood appreciates what they have here. Many people from surrounding businesses such as Group Health and even City of Lynnwood employees come to visit the mini park on Sprague's Pond to have lunch and enjoy the beauty of the park and gaze across the pond over to Scriber Creek Park area. This view would drastically be altered if C1 would be chosen so you are not only altering Scriber Creek Park but also all the adjacent parks are affected. These wetlands could be turned into a wildlife preserve and bird sanctuary and bird watching area that people would come and visit and the walkways would all tie into the bus transit center. Lynnwood should embrace the beauty and resources they have now and not have it torn apart and replaced with ugly cement structures in our skyline.

Please choose C3 for this light rail project of the Lynnwood Link Extension.

TO: Mayor Don Gough from Elaine Smith

and
Council Members

- Loren Simmonds
- Benjamin Goodman
- Sid Roberts
- Kerri Lonergan-Dreke
- Van Auburcho
- and Mark Smith
- M. Christopher Boyer

September 13, 2013

FROM: Elaine Smith
5630 - 200TH ST SW #B305
Lynnwood, WA 98036-6262

RE: Lynnwood Link Extension

Dear Mayor and Individual Council Members,

I am so sorry I am unable to attend the Community Outreach Meeting in Council Chambers tomorrow. I did attend the one at the Grange on 6-22-2013.

Please make a strong case to Sound Transit on the DEIS that Option C3 is the only option that makes sense for our community. To try to site the route in our neighborhoods along 52nd Ave W. (Options C1 and C2) would have the effect of destabilizing and brutally "big city industrializing" of our fragile-enough neighborhoods trying so hard to build up our city's sense of neighborhood closeness and cohesion. We don't need trains running through the delicate eco-system of what we all enjoy as Scriber Lake park, either.

Option C makes sense for consolidating and preserving a transit corridor we are already used to for Lynnwood. I believe it would indeed also be the best revenue-producing alternative for businesses, as many would jump at the chance to find the safe harbor of hotels, restaurants, and retail options so close to their train journeys end.

Please I count on each of you to lobby hard for what is truly best for Lynnwood, Option C3.

Sincerely, Elaine Smith

L-005-003

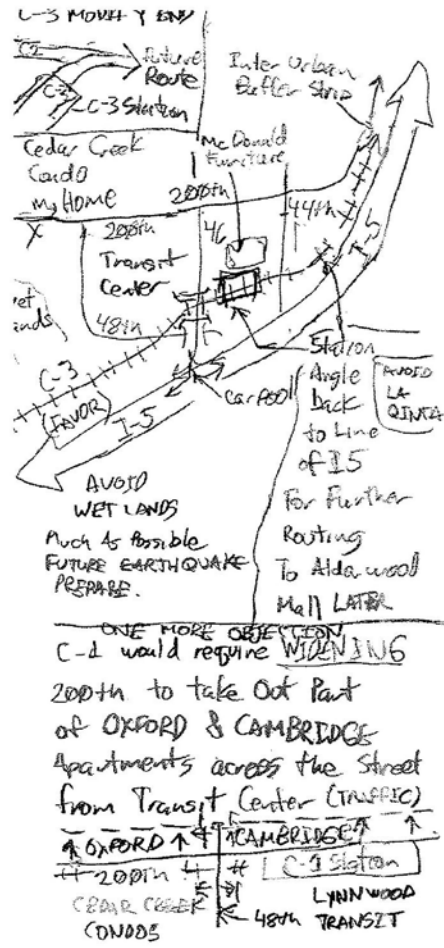
David C. WILLIAMSON
 4800th 200th St. S.W. Apt. E 205
 Lynnwood WA 98036-6362
 425-173-7354

FAVOR: C-3 (modified) → C-4 possible

REASONS:

- 1) Less Amount of Trackage Needed to Reach between 46th & 44th Street than the other Alternatives (C1 or C2)
- 2) Fewer businesses & residences Displaced (than C-1) ^{38 Businesses} 7 Residences
- 3) Earthquake Issues including the BIG Future Cascadia Event → A) 9.0 Richter Mega Thrust, B) "Shake, Rattle & Roll" last 6 to 10 minutes. IMPACT C2 adverse Greater
- 4) Less Noise & Vibration (Residences)
- 5) Less Angle of Curve on C-3 or C4 means less Wear & Tear on track & equipment as opposed to 90 degrees on C-1 or C-2
- 6) Lower Maintenance Cost on Less Trackage, Wear on Curves AVOID Wetland as much as Possible

SEND TO PUGET SOUND TRANSIT



From: Linda At Sea [<mailto:lindaatsea@yahoo.com>]
Sent: Monday, September 16, 2013 12:18 AM
To: Don Gough; pete.vonreichbauer@kingcounty.gov; Sid Roberts; Van AuBuchon; Christopher Boyer; Kerri Loneragan; Benjamin Goodwin; Mark Smith
Cc: nicolaformayor@gmail.com; Laurie Cowan
Subject: Lynnwood Link

Mayor Gough and Lynnwood City Council Members,

L-005-003

I spoke with Diane Bailey, the Administrator of the Conservation Futures Fund, and she told me that the Fund's records show the City of Lynnwood received funding for both Scriber Creek Watershed #1 and the Scriber Creek Wetlands Complex. She recommended that the City of Lynnwood check into how those monies were spent; specifically if there were Inter-local Agreements and Declarations of Protective Covenant for the properties funded with Conservation Futures, and to check on possible matching funds for these monies and any stipulations. (In addition, due to the naming conventions used in the City's, the Deis's and the Conservation Futures Fund's maps, I believe these funds may have been used to purchase other parcels of land impacted in the Lynnwood Link C Alternatives.)

Ms. Bailey also said to check the Title Report for the properties regarding any encumbrances which could have a significant impact on the use of these lands. Nancy Bartley, reporter, "The Seattle Times," interviewed David Somers, Council Member, Snohomish County Conservation Futures Program Advisory Board. It is my understanding he is getting an opinion from a Snohomish County attorney regarding the legal use of these properties. Also, a Field Visit to the potentially impacted lands is being scheduled by the EPA, with the FTA and Sound Transit.

I hope the Council ensures that all necessary information is obtained before making a final recommendation on the Lynnwood Link Alternatives on September 23, as there are many unanswered questions.

The future of a sensitive ecosystem, a large condominium community, many businesses, and the fate of a neighborhood rests with you. I believe Sound Transit will follow your lead and develop the route you recommend as it is easier to follow the path of least resistance. I also respectfully request that a motion be made by a council member for a Roll Call Vote so that citizens/voters know who agreed or disagreed with the City's recommended route to Sound Transit.

Thank you for your consideration.

Respectfully,

Linda Willemarck

From: Maureen Wojewodzki <mwojewodzki@ci.lynnwood.wa.us>
Sent: Thursday, September 19, 2013 4:07 PM
To: Lynnwood Link DEIS
Cc: Don Gough; Art Ceniza; Paul Krauss; David Kleitsch; William Franz
Subject: Transmittal of DEIS comments by Lynnwood residents (part 2)
Attachments: CitizenCommentsCouncilMtg.pdf

Dear Ms. Swift:

L-006-001 | Please accept the attached transmittal of DEIS comments by Lynnwood residents during the City Council Meeting held September 9, 2013. These comments are referenced in the Mayor's letter dated September 19th that was previously submitted. If you have any questions, please contact me at (425) 670-5001.

Best regards,
Maureen Wojewodzki
Executive Assistant to the Mayor
City of Lynnwood

L-006-001

Thank you for submitting the comments received by the City; these comments overlapped with comments Sound Transit received directly, but where they were unique, Sound Transit created a separate entry and responded directly in Appendix P of the Final EIS.

CITIZEN COMMENTS

BUSINESS MEETING

September 9, 2013

TO: Parks and Recreation Board and
TO: City Council

Below are excerpts from the 2020 Comprehensive Plan for Lynnwood that I found online. Note that the C1 and C2 routes for the Light Rail conflict with the spirit and intent of your Plan. Please choose C3 or find an alternative that does not intrude on parks, wetlands and neighborhoods.

Respectfully,



Maryellen Walsh

2020 COMPREHENSIVE PLAN - TRANSPORTATION, PAGE 1

The City's goal for the transportation system is:

To provide mobility options for residents, visitors and commuters through a balanced transportation system that supports the City's land use vision, protects neighborhoods from transportation impacts and minimizes adverse impacts on the environment.

2020 COMPREHENSIVE PLAN - TRANSPORTATION, PAGE 29

Subgoal: Environmental Factors

Minimize the impacts of the transportation system on the City's environment and neighborhood quality of life.

2020 COMPREHENSIVE PLAN - LAND USE, PAGE 21

Park/Recreation/Open Space (PRO)

Purpose: This plan category is intended to provide land area for the active and passive park and recreational needs of the city; and, to set aside areas for natural conservation.

Principal Uses: Public parks, designated open space and public recreational or educational facilities. Structures at properties in this category shall be limited to facilities needed to support the designated or planned park or open space use of the properties.

Locational Criteria: Location of these facilities will be influenced by multiple factors, including but not limited to: proximity to the population served, land availability, and amenity value of the site.

Building Design: Buildings shall be low-rise structures. Buildings in or next to residential areas shall be designed to complement residential design characteristics.

My name is Linda Willemarck. I live at 4900 200th St SW in Lynnwood. Since learning about the Sound Transit's Alternatives for the Lynnwood Link, a mere 3 months ago, I have spent a great deal of time trying to understand what properties are involved and what impacts it will have.

As you know, both the C1 and C2 Alternatives would be going down 52nd Ave West/Cedar Valley Road. In my research I found a very compelling document that really puts into perspective the importance of this area. The document reads, quote "...an established single family neighborhood containing hundreds of affordable homes and is in close proximity to several affordable housing apartments and condominium complexes, all of which would be adversely impacted by light, noise, property values, and other impacts ..."

"directly impacts hundreds of affordable homes when there are other sites available, raises social justice issues..."

"...located adjacent to significant city recreational resources of Scriber Creek and associated wetlands, and the city's Scriber Creek Park, that provide places to experience nature in close proximity to Lynnwood's City Center and regional Interurban Trail, both of which would be negatively impacted..."

"...Therefore, the City Council of the City of Lynnwood does hereby resolve and request the Sound Transit Board to remove from its potential sites and evaluations list the Lynnwood 52nd Avenue West/Cedar Valley Road site..." "

....that such site not be included in any environmental analysis, due to its many significant and unresolvable and irreparable impacts upon the City of Lynnwood, its residents and businesses and upon the Edmonds School District."

These quotes were taken from Resolution No. 2012-07 of the City of Lynnwood, Washington, regarding issues concerning the potential siting by Sound Transit. It was signed by Mayor Gough of Lynnwood on 10/22/2012.

A handwritten signature in cursive script that reads "Linda Willemarck".

My name is Linda Willemarck. My address is 4900 200th St SW in Lynnwood.

If you're familiar with the Lynnwood Link C Alternatives, then you've heard of Scriber Creek Watershed #1, now known as Scriber Creek Park, as well as the Scriber Creek Wetlands Complex – paid for, at least in part, by the Conservation Futures Fund. A fund from property taxes specifically for the purpose of preserving open space, farmland or wooded acreage.

“...to protect, preserve, maintain, improve, restore, limit the future use of, or otherwise conserve, selected open space land, farm and agricultural land, and timber land... for public use or enjoyment.”

Tom Tiegen, Snohomish County Parks and Recreation Director said, “The acquisitions are a chance for the county to make priceless additions that will benefit “our grandchildren's grandchildren.”

Conservation Futures Funding got its start in the state in 1971 under the leadership of Gov. Dan Evans. The state Legislature declared citizens had a “fundamental and inalienable right” to a healthy environment.

From “The Healing Power of Nature”, Denise Mitten, PhD writes “research has shown that time in natural spaces strengthen neighborhood ties, reduces crime, stimulates social interactions among children, strengthens family connections and decreases domestic violence, assists new immigrants cope with transition, and is cost effective for health benefits.

The Park really speaks for itself.

A handwritten signature in cursive script that reads "Linda Willemarck". The signature is written in dark ink and is positioned centrally below the main body of text.



SHORELINE
CITY COUNCIL

Keith A. McGlashan
Mayor

Chris Eggen
Deputy Mayor

Will Hall

Doris McConnell

Chris Roberts

Jesse Salomon

Shari Winstead

September 16, 2013

Sound Transit DEIS
Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

Re: Draft Environmental Impact Statement for the Lynnwood Link Extension

Dear Ms. Swift:

The City of Shoreline would like to take this opportunity to provide Sound Transit with our comments in response to the Draft Environmental Impact Statement for the Lynnwood Link Extension. The City appreciates the opportunities to participate in Sound Transit's planning process to date and the regular updates provided by Sound Transit staff throughout this process.

The City of Shoreline is excited about the extension of light rail to Shoreline in the near future. It is our City's belief that effective, fast and reliable transit service benefits our residents and the region as a whole in a variety of ways. Expanded mobility options, reduced congestion and minimizing our contribution to climate change are just a few of the benefits of a robust transit system that also mirror the goals of our Council and Shoreline's adopted plans and policies. Shoreline citizens overwhelmingly supported Sound Move and S12.

The City's primary interest with the Lynnwood Link Extension is the inclusion of two light rail stations in Shoreline. In April 2012, the Shoreline City Council identified NE 145th Street and NE 185th Street as the two preferred station locations in Shoreline and sent a letter to the Sound Transit Capital Committee stating this preference. A copy of this letter is enclosed. After reviewing the DEIS and consideration of the impacts of the Lynnwood Link Extension, the City of Shoreline remains committed to this preference. We believe that with appropriate mitigation, NE 145th Street and NE 185th Street locations represent the best alternatives for Shoreline and the region and will result in the most successful project outcome for both Sound Transit and the City of Shoreline.

The alternatives considered in the DEIS identify two station pairings in Shoreline: NE 145th Street and NE 185th Street and NE 155th Street and NE

17500 Midvale Avenue North • Shoreline, Washington 98133-4905
Telephone: (206) 801-2700 • www.shorelinewa.gov

L-007-001

Thank you for your comments and efforts in working on the initial development of the Lynnwood Link Extension.

L-007-002

Thank you for your comment stating support for the Lynnwood Link Extension.

L-007-003

Thank you for your comment stating your station preferences and reasons for wanting stations at NE 145th and NE 185th Streets and reasons for not wanting a station at NE 155th Street. Sound Transit also appreciates the City of Shoreline's willingness to plan around the proposed stations with an emphasis on multimodal access.

L-007-001

L-007-002

L-007-003

185th Street. Shoreline believes that a station at NE 145th Street is preferable to a station at NE 155th Street for several reasons. First, a station at NE 145th Street will serve as a regional station. Due to its proximity to Bothell Way NE/Lake City Way NE (SR 522), the NE 145th Street station will act as the primary station for residents of Lake Forest Park, Kenmore, Bothell and potentially points east. Several of these jurisdictions, as well as other agencies throughout the region, have provided Sound Transit with letters of support for the NE 145th Street station. Additionally, we believe close proximity to a main thoroughfare is the most appropriate location for a regional station and NE 145th Street provides this access. Most importantly, the voter approved ST2 package included stations at NE 145th Street and NE 185th Street.

In anticipation of identification of the Preferred Alternative by the Sound Transit Board, the City of Shoreline has already begun station area planning which includes increasing density around stations to facilitate transit oriented development. A significant component of that work is the evaluation of multi-modal access to the stations, with the intent of identifying new pedestrian, bicycle and transit improvements near the stations. Additionally, the City of Shoreline is leading a multi-jurisdictional planning effort for the 145th Street corridor that will evaluate and ultimately identify the necessary improvements to the roadway for vehicles, buses and nonmotorized users. These improvements will not only help to improve multimodal access to the station, they will help facilitate transit oriented development through additional and upgraded pedestrian facilities and an improved roadway for transit connections that will allow residents to access neighborhoods beyond the light rail station. Shoreline is evaluating the potential annexation of NE 145th Street from the City of Seattle and King County and has begun discussions with these jurisdictions, subject to the designation of a light rail station at NE 145th Street in the Preferred Alternative.

We believe that a station at NE 155th Street will result in significant negative impacts to the surrounding stable, single family neighborhood. The area around the proposed station, as well as properties along the 155th Street corridor, is almost entirely single family residential. The 145th Street corridor includes a mix of multi-family residential, commercial and single family uses. Because 155th Street carries anywhere from one-quarter to one-half of the daily traffic of 145th Street, the traffic impacts associated with a station at NE 155th Street will be much more significant compared to those associated with a station at NE 145th Street. The Shoreline Fire District has a fire station on NE 155th Street located between the proposed light rail station and parking structure. They have written to Sound Transit expressing their concerns that a light rail station at NE 155th Street may negatively impact emergency response times due to the increased vehicle and bus traffic associated with the station.

The City's specific station design preferences include:

L-007-004	<ul style="list-style-type: none"> NE 145th Street: Develop a station with an associated 500 space parking facility located just north of the overpass, primarily in the vegetated area between the bridge and a relocated northbound on-ramp, as shown in Alternative A3, Option 2.
L-007-005	<ul style="list-style-type: none"> NE 185th Street: Develop an at-grade station on the east side of I-5 with an associated 500 space parking structure located on the west side of I-5, primarily within the I-5 right-of-way and mostly below the grade of NE 185th Street and 5th Avenue NE, as shown in Alternative A1, Option 1.
L-007-006	<p>The City of Shoreline recommends Sound Transit construct a track alignment that is at-grade as much as possible in order to minimize cost, visual and noise impacts. All elevated sections of the alignment need to be designed in a manner that does not impede any future modifications to the interchanges at NE 145th Street, NE 175th Street and NE 205th Street.</p> <p>Four of the alternatives included in the DEIS include three stations in King County while the ST2 package only anticipated two, both of which are in Shoreline. The Preferred Alternative selected by the Sound Transit Board needs to include two light rail stations in Shoreline at NE 145th Street and NE 185th Street, consistent with the voter approved ST2 plan. Should funding be available, a third station in King County is acceptable; however, the quality of the stations and passenger facilities as well as the necessary mitigation for the impacts of the stations in Shoreline should not be compromised in order to fund the third station.</p>
L-007-007	<p>We understand that light rail passengers will travel to the station by a variety of modes – bus, bicycle, on foot and via automobile and it will be essential to accommodate them all. It is also very important that Sound Transit integrate passenger safety, comfort and convenience into the design of all facilities and transportation improvements serving the stations.</p>
L-007-008	<p>Please find enclosed a list of additional comments, issues and mitigation measures from the City of Shoreline in response to the Draft Environmental Impact Statement. The City would like Sound Transit to incorporate these into the Final Environmental Impact Statement. There are several items, specifically in regard to transportation impacts, where additional information is needed in order to accurately predict potential impacts and identify the appropriate mitigation. We anticipate that staff from both of our agencies will work to reach a resolution to these outstanding issues as part of the FEIS development and will continue to do so for other issues that arise as part of the FEIS development, system and station design and through operation of service. We trust that Sound Transit will fund the mitigation that we jointly agree are</p>

L-007-004

Thank you for your comment stating a preference for Alternative A3, Option 2 for the proposed station at NE 145th Street.

L-007-005

Thank you for your comment stating a preference for Alternative A1, Option 1 for the proposed station at NE 185th Street.

L-007-006

The City's preferences for a Segment A alternative are noted and the letter as well as a summary of the comments were given to the Sound Transit Board after the close of the comment period. The Final EIS includes supporting documentation on proposed modifications in interchange areas. The Transportation Technical Report has further details on the transportation issues in the interchange areas.

L-007-007

Sound Transit is developing the project and its stations to be easily accessible by a variety of modes, and the agency has developed design requirements emphasizing factors including safety, convenience, and comfort for patrons; as the project moves beyond preliminary engineering and into final design, Sound Transit will continue to coordinate with the City in developing station designs.

L-007-008

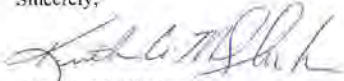
Sound Transit appreciates the City's review of the EIS and for its collaboration in planning the Lynnwood Link Extension. Responses to the City of Shoreline's detailed comments follow.

L-007-008

necessary to protect the community, preserve safety and provide this much needed light rail system.

Thank you for your consideration of our comments. We look forward to continuing to work with Sound Transit on this important project. If you have any questions or need additional information, feel free to contact Alicia McIntire, Senior Transportation Planner, at 206.801.2483.

Sincerely,



Keith A. McGlashan
Mayor

Enc. City of Shoreline Comments, Lynnwood Link Extension Draft
Environmental Impact Statement
April 2012 Screening Alternatives Comment Letter

**CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Transportation

General

- | | |
|------------------|--|
| L-007-009 | <ul style="list-style-type: none">For each station, there will be impacts to nearby intersections and roadways that need to be mitigated. It will be Sound Transit's responsibility to fully mitigate for all transportation impacts resulting from the proposed stations. The City of Shoreline does not agree that Sound Transit will only be responsible for paying a portion of improvements at some locations. Sound Transit is responsible for all costs associated with mitigation for transportation impacts that result in failures to meet Shoreline's adopted concurrency standards. The specific improvements will be designed in coordination with the City's Transportation Planning Manager and Traffic Engineer to ensure they meet the City's design and operational standards. The City of Shoreline is currently considering the adoption of transportation impact fees and an updated concurrency methodology. Sound Transit would be subject to these regulations should they be adopted. |
| L-007-010 | <ul style="list-style-type: none">All roadway improvements must be consistent with the City of Shoreline's adopted roadway standards including lane width, amenity zones, sidewalk width, bicycle facilities, stormwater management (including Low Impact Development) and parking. Improvements should be designed to minimize conflicts between nonmotorized modes (bicyclists and pedestrians) and vehicles. Roadway improvements should be extended to the nearest intersecting arterial. |
| L-007-011 | <ul style="list-style-type: none">During the City's review of the traffic model developed for this project, several errors were noted. Sound Transit needs to work with City of Shoreline staff to identify and correct these errors. Additionally, it appears that the No Build scenarios developed in the model assumed significant growth and development around the stations in Shoreline. However, if light rail stations were not going to be developed in Shoreline, the growth assumptions around these stations would be significantly different, with much less growth planned in these areas. It is critical that the traffic model be accurately calibrated and coded correctly as this will influence the base level of service and model outputs. In addition to the specific transportation mitigation identified below, the corrections to the model may identify additional issues that require mitigation. Mitigation for any newly identified impacts will be discussed and agreed upon between Sound Transit and the City of Shoreline.The traffic analysis needs to incorporate the anticipated growth at the Point Wells site in southwest Snohomish County. This development is expected to generate approximately 11,600 daily vehicle trips by 2035 and all of these trips will travel through Shoreline, as the sole access point to the site is in Shoreline. Residents of this development that will use light rail are likely to travel to the station at NE 185th Street. If this growth was not incorporated into Sound Transit's traffic analysis, Sound Transit will need to do so. The results of this revised analysis shall be reviewed with the City of Shoreline. Mitigation for any newly identified impacts will be discussed and agreed upon between Sound Transit and the City of Shoreline. |

L-007-009

While some details of the mitigation agreements with the City will depend on final design details, the Final EIS continues to state the impact that Sound Transit's project would create compared to No Action, and it defines Sound Transit's mitigation commitment to achieve future year conditions or better than with the No Build Alternative. While Sound Transit is committed to working with the City to develop solutions that could improve conditions that would be better than under the No Build Alternative, Sound Transit does not accept sole responsibility for making transportation system improvements at locations that would be below standards even with the No Build Alternative alone. The Final EIS (Section 3.6) includes further details for the Preferred Alternative on how impacts related to stations will be mitigated, and it also has updated the analysis at a number of locations in response to other comments from the City. This section also explains how Sound Transit will coordinate with the City as the project advances, and how Sound Transit could partner with the City to incorporate the Lynnwood Link Extension's proposed improvements and mitigations within projects that the City itself might pursue to address future transportation demands related to its own anticipated growth.

L-007-010

Section 2.6 of the Draft EIS described Sound Transit's Environmental Practices and Commitments, which are directly related to how Sound Transit's design standards, applicable local agency design standards, and permitting processes will be used as the project progresses through final design and into construction. The section notes, "Sound Transit will work collaboratively with other jurisdictions to comply with all required permits and approvals needed for construction and operation."

L-007-011

Sound Transit appreciates the comments on growth levels from the City, noting that the original Draft EIS assumptions for station area

L-007-012

- No mitigation is proposed in the DEIS for NE 175th Street and Meridian Avenue N, either for the temporary impacts associated with construction or for permanent impacts. During construction at NE 185th Street, particularly if the bridge is closed for 9-12 months, the City of Shoreline anticipates that there will be significant traffic diversion to NE 175th Street. These temporary impacts will require mitigation. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for construction. The City of Shoreline believes that permanent traffic impacts to this intersection and corridor can be attributed to the presence of the light rail stations and that Sound Transit is responsible for mitigating these impacts. This intersection may require turn pockets (WB to NB right turn). Other mitigation may be required at the intersection or along the corridor. Sound Transit needs to perform additional analysis of this intersection and corridor and work with the City of Shoreline to identify the appropriate mitigation for impacts to them.
- Cut-through traffic on non-arterial streets in the vicinity of the stations is likely. Measures that are designed to prevent or minimize this cut-through traffic will be required. The City of Shoreline has an adopted Neighborhood Traffic Safety Program which was created to respond to residents' concerns about speeding, cut-through traffic, accidents and pedestrian safety on non-arterial streets. Additionally, the City has developed Neighborhood Traffic Action Plans to improve the safety, mobility and livability of the City's neighborhoods. Sound Transit should contribute funding to the City's existing programs or set aside funding to work with the City of Shoreline once the stations are complete and service is in operation to identify and fund solutions for five years that reduce/mitigate cut-through traffic.
- Any impacts to the roadway network that modify streets need to maintain the existing street grid and not result in new dead end streets.

L-007-013

- Improved bus service that feeds each station will be imperative. Although the specific number of routes and frequency of service is not known at this time, the stations need to be designed to handle the maximum bus service that is forecast to serve them. Because light rail will significantly change bus service in Shoreline, a comprehensive evaluation of all transit service in the City is needed to ensure that the stations have adequate bus facilities, other facilities in the City are adequately served and that feeder service to the stations is serving all neighborhoods in Shoreline. As part of Shoreline's station area planning process this and next year, the City will prepare a Transit Integration Plan that identifies policies addressing future transit needs throughout Shoreline once light rail service begins. This process will identify levels of service and areas the City wants to see served when future service changes are implemented. This will be a coordinated process with Metro, Community Transit and Sound Transit that looks at their current policies for service distribution and redistribution of service hours in conjunction with commencement of light rail service. The expected outcome will be an agreement with Metro, Community Transit and Sound Transit on policies that will direct future transit service integration.

L-007-014

- Safety for all transportation modes is a critical aspect of facility design and development of appropriate mitigation. With the operation of light rail service, the volumes of pedestrian, bicycle, bus and vehicular traffic will increase significantly around the stations and along the roadways serving them. Many of these roadways currently serve several, if not all, of these

CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
Page 2 of 15

developments were developed in coordination with the City. For the Final EIS analysis Sound Transit met with the City to update the assumptions on growth levels. Sound Transit also updated the traffic volumes to include traffic from the proposed Point Wells development. In addition to making these localized adjustments, the forecasts were updated relative to more recent population and employment growth assumptions produced by PSRC and to reflect growth in other areas. Updated analysis of the NE 185th Street Station area and other locations, including the impacts and related mitigation, are documented in the Final EIS and the Transportation Technical Report.

L-007-012

175th at Meridian: An analysis of construction-related impacts was conducted as part of the Draft EIS and, as noted in the comments, specific mitigation was not proposed at this intersection. The Final EIS contains a refined analysis of construction-related impacts and assesses potential impacts at this intersection. The analysis of traffic impacts during the permanent configuration was also revisited for the area around the NE 185th Street Station, including the intersection of NE 175th Street/Meridian Avenue. This location was not identified for mitigation as part of the project, however.

Cut through traffic: In Chapter 3, Transportation, Section 3.6 of the Draft EIS, Sound Transit acknowledges the need to mitigate cut-through traffic and states that the mitigation would be determined in conjunction with local jurisdictions. The Final EIS Chapter 3, Section 3.6, identifies mitigation measures Sound Transit has identified to minimize the potential for cut-through traffic impacts, including neighborhood traffic control strategies that can be implemented in collaboration with the City.

L-007-013

Sound Transit agrees that effective transit connections to the stations is

L-007-014	<p>modes. As a result of the increased volumes, the conflicts between the various modes will increase significantly. For example, buses and bicycles will experience conflicts on shared roadways if buses are able to stop in a bicycle lane. Similarly, if kiss-and-ride spaces are located adjacent to bicycle lanes, there will be conflicts between bicycles and drivers as they enter and exit this area. Sound Transit needs to work with the City of Shoreline to examine the potential for conflicts between travel modes and identify the appropriate solutions to minimize conflicts and maximize safety.</p>
L-007-015	<ul style="list-style-type: none"> The DEIS states that potential transit priority treatments along N/NE 185th Street could be considered in the Final EIS. Sound Transit should install transit priority treatments along N/NE 185th Street as well as N/NE 145th Street, N/NE 155th Street and other primary transit corridors serving the light rail stations that are identified as part of the City's Transit Integration Plan.
L-007-016	<ul style="list-style-type: none"> All of the alternatives will require demolition and reconstruction of the NE 195th Street pedestrian and bicycle bridge. Design and reconstruction of the bridge shall be coordinated with the City of Shoreline and should include: a minimum width of sixteen feet (eighteen feet is preferred to provide access for emergency or maintenance vehicles); improvements to the approaches that remove the bollards and improve accessibility; provide connections to 5th Avenue NE on the west side and a connection to the school through the park (within the Interstate 5 right-of-way); improved lighting, protection for users and graffiti proof materials. The bridge may be a location where Sound Transit is able to install art. In areas where there is connected surplus right-of-way that cannot be utilized for redevelopment purposes, separated pedestrian and bicycle facilities (such as a path adjacent to Interstate 5) should be constructed to facilitate nonmotorized travel to the stations.
L-007-017	<ul style="list-style-type: none"> A separate Transportation Impact Analysis will be required for each station in Shoreline at the time of building permit submittal.
L-007-018	<ul style="list-style-type: none"> The DEIS states that column locations associated with elevated alignments may constrain sight distances and that mitigation may be required for these impacts, however, no specific mitigation is proposed. The location of any columns must comply with the City's adopted standards for site distance. Column placement will be evaluated by the City during design. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for sight distance impacts.
L-007-019	<ul style="list-style-type: none"> The City of Shoreline requires eight foot wide sidewalks adjacent to all uses other than single family residential and in areas where high pedestrian volumes are anticipated. This will be the case for all light rail stations and many of the pedestrian improvements that will serve the stations. Sidewalks must be separated from the travel lane by an amenity zone that is at least five feet wide.
L-007-020	<ul style="list-style-type: none"> The construction of any improvements along the west side of Interstate 5, including parking structures and rebuilt bridges, shall not impede the potential for future construction of a southbound Interstate 5 collector-distributor lane from NE 205th Street to NE 145th Street.

CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
Page 3 of 15

very important, and appreciates the City of Shoreline's interest in developing its own Transit Integration Plan to also consider citywide routes and services. Chapter 3 of the EIS describes the transit integration planning process that Sound Transit anticipates for the project as part of the later operational planning steps, working with King County, Community Transit, and the local jurisdictions. The City's policy statements would certainly help support that process, but the transit agencies already have established service planning steps that they must follow in making service adjustments, and levels of service also depend on available revenues for local service. Sound Transit's own service adjustment changes also have a defined process, and are made under the authority of the Sound Transit Board. Sound Transit looks forward to working collaboratively with the City and the other transit agencies during the transit integration process for the project overall, but a separate agreement with the City to direct future service planning is not consistent with the process defined for the project and used for previous projects implemented by the agency.

L-007-014

Sound Transit agrees that safe and convenient access to the stations is important. Sound Transit will work with the City during final design to develop the detailed design for the project.

L-007-015

The Draft EIS did not identify transit priority as a mitigation measure separate from other measures that could be considered to address congestion the project could cause in station areas. Transit priority continues to be noted as a supporting improvement that could be made in partnership with the City of Shoreline, King County Metro, and Community Transit, but it is not specifically part of the proposed project.

NE 145th Street Station

- L-007-021**
- The City of Shoreline is currently considering annexation of 145th Street and has begun conversations with Seattle and King County regarding this possibility. Should the annexation occur and the roadway be controlled entirely by the City of Shoreline, improvements on 145th Street would be subject to Shoreline adopted roadway and intersection standards and roadway mitigation will be subject to Shoreline's adopted standards.
- L-007-022**
- The DEIS mentions the current sidewalks on NE 145th Street, however, it fails to adequately describe their very poor condition. Sidewalks on NE 145th Street that would serve the station are substandard, do not meet ADA requirements and often contain barriers to travel, such as utility poles and mailboxes. The pedestrian environment crossing the Interstate 5 overpass is also uncomfortable, with narrow sidewalks and no buffer between pedestrians and vehicles. Other nearby streets connecting to the station are also in need of new or improved sidewalks. In order to facilitate pedestrian access to this station, Sound Transit should construct the following pedestrian improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Reconstruct sidewalks on both sides of NE 145th Street from 1st Avenue NE to 8th Avenue NE to Shoreline city standards. This is a reasonable walking zone to connect nearby residents and Lakeside school attendees along a busy and severely substandard arterial street walkway to the station at NE 145th Street.
 - Improve the pedestrian environment at the Interstate 5 interchange through wider sidewalks that are separated from the travel lanes and safer crossings. This includes the pedestrian crossing at the southbound on-ramp to Interstate 5, as the City of Shoreline does not agree with the assumption that additional traffic will not affect pedestrian safety at Lakeside High School and Middle School as stated in the DEIS.
 - Construct sidewalks on 1st Avenue NE from NE 145th Street to NE 155th Street. This is a reasonable walking distance to connect nearby residents coming from west of Interstate 5.
 - Expand the width of existing sidewalks on NE 145th Street and 5th Avenue NE to eight feet along the frontage of the station as well as at nearby bus stops and from those bus stops to the nearest intersection.
 - Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
 - Any walkways from the parking structure to the station must be safe, comfortable and provide weather protection for pedestrians.
- L-007-023**
- Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - Depending upon how buses are routed to serve the station, there need to be safe facilities for riders boarding and deboarding buses and crossing streets, where necessary. This will be of particular importance if all bus stops are located on-street rather than within the station area.

CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
Page 4 of 15

L-007-016

While design details would be further developed during final design, Sound Transit will coordinate with the City and with Washington State Department of Transportation (WSDOT) for the design and reconstruction of the bridge, and will conform with the applicable standards, permits, and approvals required by the City and WSDOT. The anticipated minimum bridge width would be 14 feet, consistent with WSDOT Design Manual 1510.14(1), but a wider width could be considered. Facilities would be ADA compatible, replace existing connections, and would meet other safety and security requirements and facility design standards. Other beneficial uses would also be considered, such as providing additional replacement vegetation for areas that must be cleared for the project.

L-007-017

Sound Transit will continue to work with the City to meet permitting requirements during the project's final design and permitting stages, but believes that the EIS analysis provides a reasonable basis for determining transportation impact levels for the stations individually as well as the project overall. On other Sound Transit projects, some jurisdictions have adopted the SEPA EIS and included supplemental information for intersection operations with final design details, or added nearer term or year-of-opening traffic projections.

L-007-018

Sound Transit will minimize site distance constraints to extent possible consistent with Design Criteria manual. However, left turns from side streets or driveways under the elevated guideway would likely be restricted and rerouted to the nearest signalized intersection for left turns or U-turns. The Final EIS clarifies the previous statement on sight distances.

L-007-023

- The City supports development of a transit patron loading and unloading area that is off-street in order to minimize street crossings and maximize safety for riders, similar to what is proposed at NE 185th Street. This area needs to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
- For safety purposes, if bus stops remain on-street the eastbound bus stop at NE 145th Street and 5th Avenue NE/Interstate 5 should be far side, not near side.

L-007-024

- It is unlikely that significant bicycle improvements will be installed on 145th Street in conjunction with the station development. However, bicyclists are likely to access the station via alternate routes. N/NE 155th Street will serve as the primary east-west route for bicyclists traveling to and from the station as it currently has bicycle lanes from Midvale Avenue N to 5th Avenue NE (bicycle lanes will be extended east to 15th Avenue NE by the City in 2014). Bicyclists are likely to access N/NE 155th Street and the NE 145th Street station and the station via 5th Avenue NE, 10th Avenue NE and Meridian Avenue N. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 185th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve the NE 185th Street station.
 - Install sharrows on 10th Avenue NE from NE 155th Street to NE 175th Street.
 - Install wayfinding signage directing bicyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
 - Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses, including improvements that prevent buses from blocking bicycle lanes at stops.
- Install a separated nonmotorized trail adjacent to Interstate 5/in the Interstate 5 right-of-way from NE 145th Street to NE 155th Street.

L-007-025

- The northbound Interstate 5 on-ramp is currently identified as a High Accident Location and should be signalized for vehicles and pedestrians as suggested in the DEIS.

L-007-026

- The intersection/interchange and NE 145th Street, Interstate 5 and 5th Avenue NE is extremely complicated. The City of Shoreline has concerns about the traffic model results and potential mitigation for this area identified in the DEIS. For example:
 - Potential mitigation at NE 145th Street and 5th Avenue NE includes adding a protected right turn phase from northbound to eastbound traffic. The City of Shoreline disagrees that this mitigation will address the identified problem.
 - The City of Shoreline has concerns about the safety and operation of the garage entrance/exit onto 5th Avenue NE (Option 2).
- Due to the close proximity of the existing intersections, the operation of each individual intersection can impact others. The existing signals at the interchange, in addition to those proposed, need to be evaluated as part of the entire corridor/coordinated system. This

CITY OF SHORELINE COMMENTS
 LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
 Page 5 of 15

L-007-019

Comment acknowledged. As noted previously, Sound Transit will work with the City during final design and permitting to address these detailed design questions.

L-007-020

The conceptual design for the project considers the potential for planned improvements along I-5, as outlined in the Compatibility Report described in Chapter 2, which was developed by Sound Transit and WSDOT, and which anticipates an additional two lanes to be added to I-5 in this area in the future.

L-007-021

As noted previously, Sound Transit is committed to consulting with local jurisdictions to successfully meet the conditions required to permit the project. The Final EIS provides additional detail for mitigation measures, including design refinements, for the project to resolve environmental impacts.

L-007-022

Sound Transit recognizes the City's interests in the conditions of its sidewalk system and in addressing safety concerns in its current system. As is appropriate for an EIS that is meant to identify significant environmental impacts for a proposed action, the EIS would not include a detailed inventory of sidewalk conditions around station areas, although the Transportation Technical Report does identify gaps. A number of the areas that are noted in the City's comments are included in the refined design developed for the Preferred Alternative. However, where the project does not alter existing facilities that may have current deficiencies, particularly in areas outside the immediate station area, the EIS continues to find that the potential for increased traffic alone does not create a safety impact. Continued growth in traffic would occur with

L-007-026

evaluation should incorporate the location of the parking garage access, off-street transit facility ingress and egress points and the northbound on-ramp. Alternate locations for the parking garage ingress/egress should be examined, including a northern location that is accessed from a roadway adjacent to the on-ramp. All improvements at this intersection/interchange need to be evaluated simultaneously for all modes to determine the appropriate mitigation at this location. Sound Transit will need to work with the City of Shoreline to identify appropriate mitigation for this intersection.

L-007-027

- The potential mitigation identified in the DEIS for NE 145th Street and 12th Avenue NE includes adding a two way left turn lane/refuge area on NE 145th Street. The City of Shoreline is concerned that this improvement will encourage drivers to use 12th Avenue NE as a cut through route, particularly when 15th Avenue NE is congested. The City of Shoreline disagrees with this proposed mitigation and recommends that it not be installed. The modeling should examine the impacts on 15th Avenue NE at NE 145th Street that this removal may cause. Additional mitigation may be required for 15th Avenue NE and Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation.
- The intersection at Meridian Avenue N and NE 145th Street is a high accident location. In order to improve safety, the intersection will need improvements in the form of northbound and southbound left turn pockets and signal phasing with protected turn movements. Left turn pockets for eastbound and westbound traffic on NE 145th Street may also be required. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for this intersection.

NE 185th Street Station

L-007-028

- Sidewalks already exist in much of the area around the station location. These sidewalks need to be adequate for anticipated pedestrian volumes. In order to facilitate pedestrian access to this station, Sound Transit should construct the following sidewalk improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Expand the width of existing sidewalks on NE 185th Street to eight feet along the frontage of the station, construct eight foot wide sidewalks along the transit center frontage, at nearby bus stops and from those bus stops to the nearest intersection. Construct a plaza and sidewalks along the station frontage adjacent to the transit center.
 - Construct sidewalks on NE 180th Street from 10th Avenue NE to 15th Avenue NE and 10th Avenue NE from NE 175th Street to NE 195th Street and the NE 195th Street pedestrian/bicycle bridge. This is a reasonable walking zone to connect riders coming from North City and north and east of the station.
 - Construct sidewalks on 5th Avenue NE from NE 185th Street to NE 195th Street. This will connect riders to the Interurban-Burke Gilman Trail connector, which is expected to be a major nonmotorized route to the station. It is a reasonable walking zone to connect riders coming from the north of the station.
 - Construct sidewalks on 5th Avenue NE/7th Avenue NE from NE 175th Street to NE 185th Street. This is a reasonable walking zone to connect riders coming from south of the station.

*CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
Page 6 of 15*

or without the project, and the City's interest in addressing safety issues, consistent with its Transportation Master Plan, would be present in any case.

L-007-023

The Final EIS and its accompanying design documents have developed further details on access features for the Preferred Alternative. However, these designs are preliminary and details would be confirmed during final design, in collaboration with the City, WSDOT, and transit providers. A near-side bus stop for eastbound buses on NE 145th Street was included in the concept design because it required one street crossing versus two, to reach the station, but again, this configuration, as with all other elements in station areas, reflects the major features that define the physical footprint and operating characteristics that form the basis of the impact analysis contained in the EIS.

L-007-024

The major features of the Preferred Alternative are described in the Final EIS, and this includes the primary access facilities for the stations. During final design, Sound Transit will coordinate with the City to explore opportunities for improving station access. Some of the specific features described in the City's comment are more detailed than the conceptual to preliminary design developed to support the EIS, and these features would be considered in coordination with the City during final design.

L-007-025

The Final EIS has further details on the proposed treatment for the on-ramp intersection. However, final decisions would follow final design, in coordination with WSDOT, the City, and other involved agencies.

L-007-028

- Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
- Should a parking structure be located on the east side of the freeway, any walkways from the structure to the station must be safe, comfortable and provide weather protection. Should a parking lot be constructed in the Seattle City Light right-of-way, sidewalks to the station should be widened to eight feet and provide weather protection.
- The NE 185th Street bridge will need improvements for pedestrians that are safe, comfortable and provide weather protection. This may come in the form of significant improvements or reconstruction of the NE 185th Street bridge. Should the parking structure be located on the west side of the freeway, a separate pedestrian overcrossing from the parking structure across Interstate 5 to the station may be required. The bridge should provide a strong connection to the Shoreline Center. Sound Transit will need to work with the City of Shoreline to identify the appropriate design and amenities for the bridge.
- Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - The NE 185th Station is likely to serve as a transit center, with Community Transit considering termination of their Swift BRT service there. The bus facilities at this station should be off-street and need to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
 - Safe facilities for riders boarding and deboarding buses and crossing streets should also be installed.
 - Bus pullouts are needed on NE 185th Street at stops near the station to minimize conflicts with bicycles and allow traffic to pass.

L-007-029

- Bicycle safety: N/NE 185th Street currently has bicycle lanes from Midvale Avenue N to 1st Avenue NE (The bicycle lanes will be continued to 10th Avenue NE by the City in fall 2013) and will be the primary east-west bicycle route serving the station. NE 195th Street will be the secondary east-west bicycle route serving the station. Bicyclists are likely to access NE 185th Street and the station via 1st Avenue NE, 5th Avenue NE, 7th Avenue NE and NE 195th Street. Bicyclists coming from North City and east of the station are likely to travel on NE 180th Street, 10th Avenue NE and NE 185th Street. Improvements on these and other routes bicyclists will use to access the station should be installed. The conflicts between bicyclists and buses should also be minimized and buses cannot block bicycle lanes. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 145th Street or NE 155th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve NE 145th Street or NE 155th Street station.
 - Install bicycle lanes on 5th Avenue NE from NE 185th Street to NE 195th Street. These lanes will connect with the Interurban-Burke-Gilman Connector route on NE 195th Street.

CITY OF SHORELINE COMMENTS
 LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
 Page 7 of 15

L-007-026

Sound Transit agrees operations in this area are complex, and that final design efforts will continue to explore the best options for ensuring effective operations. The Final EIS Chapter 3, Transportation, and the Transportation Technical Report have the results of an updated analysis of the NE 145th Street Station area using microsimulation software. This tool was also used to evaluate the effectiveness of mitigation measures described in the Final EIS.

L-007-027

Section 3.6, Potential Mitigation Measures of the Draft EIS, describes a potential measure to address the impacts at these intersections. As the Draft EIS states, Sound Transit will provide improvements as agreed to by the local jurisdiction. Sound Transit will continue coordination with the City of Shoreline to develop mitigation measures that are mutually acceptable.

L-007-028

Sidewalks: Sound Transit recognizes the City's interests in the conditions of its sidewalk system and in addressing safety concerns in its current system. As is appropriate for an EIS that is meant to identify significant environmental impacts for a proposed action, the EIS would not include a detailed inventory of sidewalk conditions around station areas, although the Transportation Technical Report does identify gaps. A number of the areas that are noted in the City's comments are included in the refined design developed for the Preferred Alternative. However, where the project does not alter existing facilities that may have current deficiencies, particularly in areas outside the immediate station area, the EIS continues to find that the potential for increased traffic alone does not create a safety impact. Continued growth in traffic would occur with or without the project, and the City's interest in addressing safety issues, consistent with its Transportation Master Plan, would be present in any case.

L-007-029

- Install bicycle lanes on 1st Avenue NE from NE 185th Street to NE 195th Street. These lanes will connect with the Interurban-Burke-Gilman Connector route on NE 195th Street.
- Install wayfinding signage directing cyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
- Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses or vehicles, including improvements that prevent buses from blocking bicycle lanes at stops. Kiss-and-ride facilities should not be located adjacent to bicycle facilities.

L-007-030

- The northeast corner of the intersection at NE 175th Street and 5th Avenue NE has a tight turning radius, which only the shortest Metro buses can navigate. If it is anticipated that larger buses will be utilizing this intersection to serve the station at NE 185th Street, this radius will need to be improved by Sound Transit.
- The potential improvements for 5th Avenue NE on the west side of Interstate 5 and 7th Avenue NE (5th Avenue NE on the east side) include adding a two-way left turn lane or refuge area on NE 185th Street. In addition to a turn lane/refuge area, the City of Shoreline believes a traffic signal will be needed for one or both of these intersections, depending upon the location of the parking garage, the transit center function and the realignment of 7th Avenue NE. It is likely that a signal will be needed at the transit center so that buses can exit quickly and safely. Sound Transit needs to perform additional analysis of these intersections and work with the City of Shoreline to identify the appropriate mitigation for them. Any roadway improvements will need to be in compliance with the City's road standards, including installation of bicycle and pedestrian facilities.
- Regardless of the alternative selected, the entire roadway from 1st Avenue NE to 10th Avenue NE will need to be rechannelized with a three lane cross-section and bicycle lanes to provide for continuous lanes. This will require removal of on-street parking.
- The analysis states that Meridian Avenue N and NE 185th Street will operate at LOS F in the No Build and all of the build options. The City of Shoreline believes that the No Build LOS F may be based on overestimated volume assumptions. The City assumed significant growth around the light rail stations as part of its traffic model provided to Sound Transit for analysis. However, if no light rail station is present, the assumptions would be very different for this area, with almost no growth planned in the vicinity. It appears Sound Transit's No Build alternative assumed the growth levels around light rail station areas in Shoreline would be the same with or without the light rail station. The City of Shoreline believes that the impacts to this intersection are significantly different under the No Build alternative and all options for this station. The City of Shoreline also believes that the proposed improvements of only adding protected-permissive phasing will not be sufficient to correct the level of service deficiencies and that the installation of northbound and southbound add/drop lanes is necessary to mitigate the impacts. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it for all options.

CITY OF SHORELINE COMMENTS
 LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
 Page 8 of 15

NE 185th Street Bridge: While design details would be further developed during final design, Sound Transit will coordinate the provision of acceptable non-motorized crossing facilities adjacent to or part of the 185th Street Bridge if needed to facilitate access to the station.

L-007-029

The major features of the Preferred Alternative are described in the Final EIS, and this includes the primary access facilities for the stations. During final design, Sound Transit will coordinate with the City to explore opportunities for improving station access. Some of the specific features described in the City's comment are more detailed than the conceptual to preliminary design developed to support the EIS, and these features would be considered in coordination with the City during final design.

L-007-030

As the Draft EIS states, Sound Transit will provide improvements as agreed to by the local jurisdiction. Sound Transit will continue coordination with the City of Shoreline to develop mitigation measures that are mutually acceptable.

NE 185th Street at 5th Avenue NE: No adverse impacts, but the Preferred Alternative includes some improvements in the 185th Station area.

NE 185th Street between 1st Avenue NE and 10 Avenue NE: No adverse impacts, potential coordinated improvements are possible along NE 185th Street between 1st Avenue NE and 10th Avenue NE.

NE 185th Street and Meridian Avenue N: The revised analysis shows that the Project causes a failing level of service (LOS) per local jurisdiction standards. Proposed mitigation includes adding protected-

- L-007-030**
 - The DEIS identifies the need for improvements at 10th Avenue NE (add an eastbound right turn pocket) only with the parking lots, not parking garages. The City of Shoreline believes improvements will be needed at this intersection for all of the parking options at this station location. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it for all options.
- L-007-031**
 - A parking structure that is located on the west side of Interstate 5 could be jointly used by the Shoreline Center, particularly visitors to the Shoreline Stadium. The potential for shared use during off-peak hours should be explored to maximize the public benefit of this facility.

NE 155th Street Station

- L-007-032**

As the City of Shoreline cover letter dated September 16, 2013 states, the City strongly prefers that a light rail station be located at NE 145th Street rather than NE 155th Street. The following comments outline the City of Shoreline's concerns and mitigation requirements should a station be located at NE 155th Street. These comments should not be construed as endorsement of the proposed NE 155th Street station location.
- L-007-033**
 - The pedestrian environment around the potential station at NE 155th Street requires improvements. In order to facilitate pedestrian access to this station, Sound Transit should construct the following sidewalk improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Construct improvements to the pedestrian environment on NE 155th Street under the freeway including wider sidewalks that are separated from the travel lanes and pedestrian scale lighting.
 - Expand the width of existing sidewalks on NE 155th Street to eight feet along the frontage of the station, at nearby bus stops and from those bus stops to the nearest intersection.
 - Construct sidewalks on NE 1st Avenue NE from NE 145th Street to NE 155th Street. This is a reasonable walking zone to connect nearby residents and for riders coming the south of the station.
 - Construct/install new and improved pedestrian crossings of NE 155th Street at 1st Avenue NE and at the bus stops. Sound Transit needs to work with the City to identify the appropriate design for these crossings, which may include signalization.
 - Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
 - Any walkways from the parking structure to the station must be safe, comfortable and provide weather protection.
- L-007-034**
 - Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - Depending upon how buses are routed to serve the station, there need to be safe facilities for riders boarding and deboarding buses and crossing streets, where necessary. This will be of particular importance if all bus stops are located on-street rather than within the station area.

CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
Page 9 of 15

permissive phasing to the northbound and southbound left-turn movements. This improves intersection operations similar to No Build conditions.

NE 185th Street and 10th Avenue NE: The revised analysis does not identify any adverse impacts and therefore no traffic improvements or mitigation are identified at the NE 185th Street and 10th Avenue NE intersection.

L-007-031

The parking supply anticipated to be needed for the transit project has continued to be the primary consideration in the currently proposed design. For the Preferred Alternative, Sound Transit has included a design option for a joint use parking garage on Shoreline School District Property at 185th Street adjacent to the Shoreline Stadium.

L-007-032

Sound Transit acknowledges the City's preference for a station at NE 145th Street over NE 155th Street, which also was noted in the Draft EIS.

L-007-033

The alternatives featuring a NE 155th Street Station have remained in the Final EIS, but as with the Preferred Alternative, the scope of the proposed features are focused on station areas rather than on improvements needed elsewhere in the transportation system where inadequacies may currently exist. Several of the issues would involve final design details; Sound Transit will develop final design details for the project selected to be built in coordination with the City.

L-007-034

As noted above, the conceptual design elements for the alternatives with

L-007-034

- Develop a transit patron loading and unloading area that is off-street in order to minimize street crossings and maximize safety for riders, similar to what is proposed at NE 185th Street. This area needs to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
- Bus pullouts are needed on NE 155th Street at stops near the station to minimize conflicts with bicycles and allow traffic to pass.

L-007-035

- N/NE 155th Street currently has bicycle lanes from Midvale Avenue N to 5th Avenue NE (bicycle lanes will be extended east to 15th Avenue NE by the City in 2014) and will be the primary east-west bicycle route serving the station. Bicyclists are likely to access NE 155th Street and the station via 5th Avenue NE, 10th Avenue NE and Meridian Avenue N. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 185th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve the NE 185th Street station.
 - Install sharrows on 10th Avenue NE from NE 155th Street to NE 175th Street.
 - Install bicycle facilities on 1st Avenue NE from NE 145th Street to NE 155th Street. The City's Transportation Master Plan did not anticipate the need for bicycle facilities on this street, as it was assumed that a light rail station would be located at NE 145th Street rather than NE 155th Street. Sound Transit needs to work with the City of Shoreline to identify the appropriate bicycle facilities for this roadway.
 - Install wayfinding signage directing cyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
- Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses, including improvements that prevent buses from blocking bicycle lanes at stops.

L-007-036

- The City of Shoreline agrees that the eastbound right turn lane at Aurora Avenue N and N 155th Street may need to be changed to a shared through/right-turn lane as suggested in the DEIS. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.
- Potential mitigation at NE 155th Street and 1st Avenue NE includes adding a right turn pocket. The City of Shoreline disagrees that this mitigation will address the identified problem and believes this intersection will require signalization. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.
- Potential mitigation at NE 165th Street and 5th Avenue NE includes adding a second northbound through lane on 5th Avenue NE. The City of Shoreline disagrees that this mitigation will address the identified problem and believes this intersection may require signalization. Sound Transit

CITY OF SHORELINE COMMENTS
 LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
 Page 10 of 15

the NE 155th Street Station remain largely as discussed in the Draft EIS. As with the Preferred Alternative, Sound Transit will develop final design details for the project selected to be built in collaboration with the City, WSDOT, and transit providers. All facilities would be designed to provide safe and effective access.

L-007-035

The alternatives featuring a NE 155th Street Station have remained in the Final EIS, but as with the Preferred Alternative, the scope of the proposed features are focused on station areas rather than on improvements needed elsewhere in the transportation system where inadequacies may exist. Several of the issues would involve final design details; Sound Transit will develop final design details for the project selected to be built in coordination with the City.

L-007-036

Not affected by the Preferred Alternative. For the Final EIS discussion, options to address the impact for other light rail alternatives could include a range of measures ranging from signalization to the proposal already included in the Draft EIS. As noted in the Draft EIS, Sound Transit would provide the potential improvements discussed or other improvements as agreed to by the local jurisdiction during final design.

L-007-036 | needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.

L-007-037 |

- Provide a correction in the FEIS that there is only one option remaining for paratransit and passenger pick up/drop off locations and that it is off street.

L-007-038 | Parking

- The parking analysis evaluated utilization between 9 am and 11 am and 1 pm and 4 pm. While it is likely that cars will be parked there during those times, drivers that will park in the neighborhoods are likely to arrive earlier and leave later, when local residents still have vehicles parked on street or are returning home. Thus, Sound Transit did not evaluate the worst case scenario for parking impacts. The City of Shoreline is uncertain that the potential for spillover parking is low simply because a large garage is planned as stated in the DEIS, as this does not seem consistent with Sound Transit's experience elsewhere. The DEIS states "For parking controls agreed to with the local jurisdiction, Sound Transit would be responsible for the cost of installing the signage or other parking controls for 1 year after opening the light rail system. The local jurisdictions would be responsible for monitoring the parking controls and providing all enforcement and maintenance". The City of Shoreline does not agree with this mitigation. Sound Transit should set aside funding to work with the City of Shoreline once the stations are complete and service is in operation to identify and fund solutions that reduce/mitigate spillover parking. This may include funding the establishment and enforcement of a residential parking zone for five years. Sound Transit could also consider utilizing parking revenues to fund parking management/enforcement in Shoreline.

Land Use

- L-007-039** |
 - When describing the City of Shoreline's Comprehensive Plan Land Use Policies, the DEIS states "The land use policies would further guide land use regulations for station areas at NE 145th and NE 185th streets, including transit-supportive developments with residential components mixed with complementary commercial and office uses". Please note that the City's policies will recommend high-density residential in the station areas around NE 145th Street and NE 185th Street as part of transit-supportive developments.
 - As part of its light rail station subarea planning process, the City of Shoreline will explore the creation of development regulations addressing the location of commercial/retail uses as part of parking structures. Sound Transit is subject to the City's land use regulations when developing the light rail stations and associated facilities.

Visual and Aesthetic Resources

- L-007-040** |
 - Removal of significant trees is regulated by and may be partly mitigated by replacement as prescribed in the Shoreline Municipal Code. Mitigation for the visual impacts associated with tree removal should include replacement with larger sized trees. Sound Transit should plant replacement vegetation as early as possible to help minimize visual impacts. This may include installation of replacement vegetation outside of disturbance areas prior to construction.

L-007-037

The text describing paratransit elements for the NE 155th Station has been updated for the Final EIS.

L-007-038

The parking inventory was performed during the times when the parking garages are assumed to have the highest utilization and the potential for spillover parking would be greatest. The Final EIS describes the proposed mitigation approach to address the potential for spillover parking.

L-007-039

The Final EIS has been updated to reflect the City's most current adopted Comprehensive Plan Land Use policies.

L-007-040

Sound Transit will comply with the City of Shoreline tree replacement regulations as applicable and feasible. The City of Shoreline's comments about mitigation for loss of significant trees, including larger specimens, as well as the incorporation of public art, are consistent with the list of mitigation measures on Draft EIS pages 4-91 through 4-93, which include landscaping and elements providing visual interest. Refinement of mitigation approaches will continue through final design.

- L-007-040**
- It will be important to coordinate with the City regarding station design. The design must comply with the City's commercial, station area or other applicable design standards, depending on the ultimate zoning of the station sites. Other potential mitigation for visual impact would be to use 1% for art on areas that have a high visual impact and low potential for screening.

Noise and Vibration

- L-007-041**
- Noise walls should be relocated and/or constructed as early as possible to help minimize noise impacts associated with construction.
 - Sound Transit should work with property owners both during the design and construction phases to ensure all noise and vibration impacts have been properly mitigated. Once the project is completed and service is operational, Sound Transit should continue to work with property owners to ensure all noise and vibration impacts have been mitigated.

Ecosystem Resources

- L-007-042**
- Mitigation for wetland impacts shall be as described in Shoreline Municipal Code, including replacement at the ratio described in the code and no net loss of function and value of wetland resources.

Water Resources

- L-007-043**
- Page I-4.9-7 (Appendix I) lists the stormwater design manuals for jurisdictions in which construction will occur. While these are the current requirements, the National Pollutant Discharge Elimination System Phase II permit will require all jurisdictions to adopt the 2012 Stormwater Manual or equivalent by end of 2016. The stormwater design manuals in some of the jurisdictions are likely to change with the adoption of new requirements.
 - All construction and improvements must comply with the City's adopted regulations for stormwater management, including Low Impact Development.

Geology and Soils

- L-007-044**
- Figure I-4.11-2b does not identify peat located near Ronald Bog located at NE 175th Street and Meridian Avenue N, just west of Interstate 5. It is known that peat exists in this area, however, it is unknown the extent and/or if it extends east of Interstate 5. The area under Interstate 5 was a wetland prior to construction. Since peat is not shown where it is known to exist, soil conditions should be verified in the area east of Interstate 5 where support may be needed. Sound Transit should conduct additional borings in that area to confirm conditions.

Public Services, Safety and Security

- L-007-045**
- The proposed light rail station at NE 155th Street places the fire station between the light rail station and the parking facility. This location and layout will interfere with the existing Fire

CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
Page 12 of 15

L-007-041

For at-grade noise walls, it is normally the practice to install these walls early in the construction process to aid in the reduction of construction noise levels. This statement was included in the construction noise mitigation section.

Sound Transit will work with property owners during the design, construction, and operation phases of the project to ensure noise and vibration impacts are mitigated to levels below FTA impact thresholds and local criteria.

L-007-042

As noted in the Draft EIS Chapter 2, Environmental Practices and Commitments, Sound Transit will obtain permits required under local critical area codes, including those of the City of Shoreline, and will meet the permit requirements. Where major compensatory mitigation measures are known, potential sites were identified in the Draft EIS and have been refined in the Final EIS, and the anticipated standards are discussed, with details to be further confirmed during permitting phases of the project.

L-007-043

Thank you for your comment pertaining to the stormwater design manuals and the use of low-impact development (LID). Sound Transit will abide by all applicable stormwater design standards and latest approved manuals in the City of Shoreline code, as well as with the updated NPDES Phase II permit requirements. In addition, Sound Transit requires all projects to consider LID methods as a first choice for stormwater treatment (Design Criteria Manual, July 2012), and the agency will continue to review the feasibility of LID strategies as part of the project design.

L-007-045

Station just east of Interstate 5 due to increased bus, vehicle, pedestrian and bicycle traffic generated by the light rail station, thereby negatively impacting emergency response times. Depending on the specific design of the rail line itself and/or the station and the subsequent increase in traffic, the fire department may have to consider moving the facility all together. Sound Transit shall work with the Shoreline Fire Department to ensure emergency service functions and operations can continue during construction and with operation of the light rail station or relocate the fire station.

- In addition to other public safety providers, Sound Transit Police will also have jurisdiction at the light rail stations, which will influence response times. The impacts of this coordination and strategies to reduce redundancies between providers should be described in the FEIS.
- The majority of existing open-air (non-tunnel) Sound Transit stations do not have security personnel physically present as a deterrent. Many stations are monitored via camera by security personnel, who then have to report activity via phone and radio, creating ineffective prevention and response. At minimum, the physical presence of security personnel actively patrolling the facilities and buses serving the stations, combined with CCTV active monitoring, are necessary for prevention and timely reporting. Security shall be funded by Sound Transit.
- Safety and security needs to be fully integrated with design of the stations, parking structures and other facilities. Design of facilities shall be coordinated with the City of Shoreline Police Department. Safety issues that need to be addressed include:
 - Integration of Crime Prevention Through Environmental Design (CPTED) into all facilities.
 - Elevated platform emergency response requires more planning and redundant design features due to choke points inherent to mass movement to the boarding platform.
 - Sound Transit should consider developing City of Shoreline stations as closed system design, requiring pay at surface/grade level in order to enter areas for ridership flow and access to light rail vehicles.
 - Guideways will need significant passive barriers that prevent access to elevated, as well as at grade, locations not intended for rider use. Barriers should be integrated into overall security and CPTED design, as it would serve as a deterrent to theft and vandalism.

Utilities**L-007-046**

- The DEIS identifies a 24-inch diameter water line crossing at NE 185th Street (this is incorrectly identified as a Shoreline Water District water line; it is a Seattle Public Utilities water line). Any modifications to or replacement of the NE 185th Street bridge must be sure not to impact this line or disrupt service to customers. This water line may need to be replaced. The City of Shoreline is in the process of acquiring the Seattle Public Utilities water utility located within the city limits and anticipates ownership will be completed by 2020. All design and construction discussions about impacts to this and other Seattle Public Utilities water utility facilities located within the City of Shoreline shall include Shoreline staff prior to and after the acquisition is complete.

CITY OF SHORELINE COMMENTS
 LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
 Page 13 of 15

L-007-044

Sound Transit is aware of the presence of peat near Ronald Bog and has conducted additional borings on the east side of I-5 to further define soil and groundwater conditions in this area. Additional work and related analysis will be conducted during final design and permitting.

L-007-045

Issue 1: Effects on fire station. Sound Transit is aware of the Fire Department's concerns about the possible impacts of a station at NE 155th Street on the operations of the fire station at that location. In the design and development of a station at that location, and the management of traffic serving the station, Sound Transit would work closely with the Fire Department to resolve any potential conflicts with bus and vehicle traffic to ensure that emergency response times would be maintained both during the construction period and operation of light rail.

Issue 2: Sound Transit Police jurisdiction. Sound Transit currently has several years of experience working in coordination with the public safety providers of local jurisdictions to ensure the safety and security of the public and to reduce redundancies. The Draft EIS discussed Sound Transit's security force, and states that final station designs will incorporate crime prevention through environmental design principles to deter criminal activity and to make station areas safer and more secure.

Issue 3: Open air stations need to have personnel actively patrolling the facilities and buses serving the stations at all times. Sound Transit now has several years of experience with safety and security across all modes, and is confident that its operating systems are appropriate to ensure the personal and physical safety of its passengers. Sound Transit is currently centralizing its video and alarm monitoring system across all modes, including vehicles and stations, and constantly reviews its operations to ensure passenger safety.

L-007-046

- As part of the City of Shoreline's acquisition of the portion of the Seattle Public Utilities water system located within Shoreline, the City is required to separate the system including installation of a new trunk line in the N/NE 145th Street right-of-way. This construction work is likely to occur from 2018-2020, at which time construction on the Lynnwood Link Extension will be underway. As design progresses for both projects, Sound Transit and the City of Shoreline will need to coordinate water line construction schedules to determine the best course of action to minimize disruption to residents and users of the corridor. Opportunities for construction efficiencies should also be explored.

Parks and Recreational Resources/4(f) and 6(f) Evaluation**L-007-047**

- Construction will impact Ridgecrest Park as well as access to the park. The DEIS includes a general list of construction mitigation options and states that Sound Transit will work with jurisdictions to develop appropriate construction mitigation. As design progresses and construction plans are developed, the City will work with Sound Transit to identify mitigation to minimize construction impacts to park users and plans for restoration of disturbed areas.
- Ridgecrest Park was originally purchased by King County with Forward Thrust funding. In accordance with the requirements of Forward Thrust, any park land acquired must be replaced with like property. It will be Sound Transit's responsibility to coordinate with King County to prepare the land conversion process with like property. The conversion has to be approved by King County before the City of Shoreline can authorize purchase of the property for the Lynnwood Link Extension. Sound Transit will need to work with the City's Parks Department to identify the appropriate location and type of mitigation for this acquisition.

Construction**L-007-048**

- Should the NE 185th Street bridge need to be reconstructed, the DEIS states that the roadway may need to be closed for 9-12 months. A closure of this magnitude will have significant impacts to the community. It will eliminate a major east-west access roadway and result in additional congestion at NE 175th Street, as drivers utilize this roadway as a substitute. Shoreline has a strong preference against full closure of this key arterial corridor and will require Sound Transit to develop options to avoid one, such as a temporary bridge or a half closure. The DEIS does not identify how other roadways, such as NE 175th Street, will be impacted if the NE 185th Street bridge is closed. There is no discussion of any impacts, suggested detours or mitigation. Sound Transit should explore alternative construction methods that do not require a full closure of the roadway should this bridge need to be reconstructed. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for these construction impacts.
- Reconstruction or improvements to the NE 185th Street bridge will need to be staggered with reconstruction of the NE 195th Street bridge so that at least one bridge is usable for bicyclists and pedestrians at all times.
- Shoreline will want to be involved in the early development of construction plans for this project. Coordination between Shoreline, Sound Transit and other agencies will include issues such as phasing and timing for various stages of construction, rerouting of bus service, impacts

CITY OF SHORELINE COMMENTS
 LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT
 Page 14 of 15

Issue 4: Safety and security in design of station and other facilities. Sound Transit integrates Crime Prevention Through Environmental Design (CPTED), as included in Section 4.14.2 in the Draft EIS, in the design of all its facilities. All station platforms, including elevated platforms, are designed to accommodate emergency response and to be able to safely evacuate trains and platforms in the event of an incident. Design and security measures are used to prevent access to areas not intended for rider use.

L-007-046

Geographic Information System (GIS) data on the 24-inch-diameter water line crossing at NE 185th Street confirms that this water line is a Seattle Public Utility water line. It was incorrectly identified in the Utility Conflict Matrix as a Shoreline Water District water line and this was updated for the Final EIS. As the Draft EIS states in Section 4.15.2, Sound Transit will coordinate with the utilities to confirm and resolve potential conflicts. Sound Transit will also continue to work with utility providers to minimize any potential service interruptions (Section 4.15.5 Mitigation).

L-007-047

The Final EIS notes Sound Transit's commitment to working with the City and King County to address Forward Thrust requirements as they apply to the park, and to help the City identify appropriate property to acquire for parks use as compensatory mitigation. Potential replacement property options have been described in the Final EIS. Additional coordination with the City is reflected in the Final EIS.

L-007-048

Bullet 1 (Should the NE 185th...) With the Preferred Alternative the NE 185th Street bridge would not be rebuilt, although some access

to Ridgecrest Park, utility relocations including the City's waterline separation work at N/NE 145th Street, night work, truck/haul routes, detour routes, hazardous materials response planning and inspection coordination.

- The review of plans and construction management for this project will result in a significant work load for the City of Shoreline employees. Sound Transit will need to provide funding to the City to pay for additional human resources tasked with design and construction related review of the project.
- Mitigation is required to ensure that bus service is minimally interrupted during construction. Because the North Jackson Park park and ride facility at NE 145th Street and 5th Avenue NE will be used for construction staging, an alternative, temporary park and ride facility(ies) shall be sited and signed in the vicinity for routes that serve it. The existing transit only off ramps should remain in operation until light rail service begins and bus service is permanently rerouted.
- When access to properties is impacted, it should be partial only. Sound Transit shall maintain access to all properties during construction unless an alternative is mutually agreed upon by Sound Transit and the property owner. Exceptions may include short duration full closures for tasks such as paving and pouring and curing concrete.
- Noise from construction, including night work, must be mitigated to the fullest extent possible.
- Construction equipment has the potential to impact the condition of roadways that are part of haul routes. An assessment of the pavement condition for roads serving the station should be performed by Sound Transit and approved by the City before and after construction to help document any damage that occurs during construction. Damage to roadways resulting from construction activities must be repaired by Sound Transit.
- Measures should be taken during construction to avoid any short term impacts to Thornton Creek. Appropriate Best Management Practices shall be implemented and monitored during construction to avoid impacts to water quality.

modifications for pedestrians may be added; there would be no full closure. For Alternative A1, the Transportation Technical Report incorrectly stated in Table 6-1 for Alternative A1 that the bridge would be fully closed for 9-12 months. This error has been revised to indicate that one lane of the bridge would be closed in each direction for 1 month, as stated in the Draft EIS on page 3-44 and in Table 3-24.

Bullet 2 (Reconstruction or improvements...) The Draft EIS states construction of NE 185th Street would be staged or staggered (Section 3.3 page 3-43).

Bullet 3 Sound Transit will involve the City in the development and review of final design details, including construction plans.

Bullet 4 Agreements associated with the next phases of the project will be negotiated as the project moves forward.

Bullet 5 Mitigation for bus service during construction was described in section 3.6.9 of the Draft EIS (page 3-55), and more detail on the degree of mitigation for the specific stations and routes has been included in Section 3.6 of the Final EIS for the Preferred Alternative.

Bullet 6 The Draft EIS, Section 3.6.9 Arterials and Local Streets, states that *if access to the property cannot be maintained, the specific construction activity would be reviewed to determine if it could occur during non-business hours, or if the parking spaces and users of this access (for example, deliveries) could be provided at an alternative location.*

Bullet 7 (noise from construction...) Section 4.7.7 of the Draft EIS describes potential mitigation measures for construction-generated noise. Specifically, Section 4.4.7 states that noise mitigation would be implemented in order to meet local regulatory requirements, noise

SHORELINE
CITY COUNCIL
Keith A. McGlashan
Mayor
Chris Eggen
Deputy Mayor
Will Hall
Doris McConnell
Chris Roberts
Jesse Salomon
Shari Winstead

L-007-049



April 11, 2012

The Honorable Fred Butler
Chair, Sound Transit Capital Committee
401 South Jackson Street
Seattle, WA 98104-2826

Re: Screening Alternatives for the North Corridor Transit Project

Dear Chair Butler:

The City of Shoreline looks forward to the extension of light rail north and is excited for new transit service for our residents and the region. As Sound Transit is currently considering station locations and alignment for the Lynnwood Extension project to be considered in the Draft Environmental Impact Statement, the Shoreline City Council would like to provide our input in this critical process.

The City Council has reviewed the potential station locations and route alignment and has determined that the best fit for our community and the success of the project overall is to place stations at 145th Street and 185th Street, with alignment on the east side of I-5.

We believe that these station locations provide the greatest opportunities for redevelopment around the station areas, minimize traffic impacts in neighborhoods, are the most readily accessible and can best be served by transit. To prepare for these future stations, Council is developing framework policies for adoption in May to guide station area planning that will allow for future transit oriented development around the stations. The Council is committed to working with our community to plan for new residential and commercial opportunities.

We are concerned about the inclusion of a potential station at 155th Street in Shoreline. When applying our draft framework policies to the possible station locations in conjunction with consideration of the existing surrounding land uses, NE 145th Street shows significantly greater potential for transit oriented development. Its proximity to the commercial node at 15th Avenue NE, Aurora Avenue N, Lakeside School and multi-family development along the 145th Street corridor strengthen future opportunities for successful redevelopment that complements and focuses on the use of transit as a primary transportation mode.

We understand that the evaluation of a station at NE 125th Street or NE 130th Street will be performed as a pairing with a station at NE 155th Street and these two stations would serve as a substitute for a station at NE 145th Street. We

17500 Midvale Avenue North ♦ Shoreline, Washington 98133-4905
Telephone: (206) 801-2700 ♦ www.shorelinewa.gov

ordinances, and permit and variance conditions.

Bullet 8 (Construction equipment..) Sound Transit will repair any public rights-of-way at Sound Transit work sites that are damaged during construction to substantially the same condition.

Bullet 9 Sound Transit recognizes the importance of Thornton Creek, and the project will abide by all applicable federal, state, and local environmental laws and regulations. Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on ecosystem mitigation is to avoid impacts on environmentally sensitive resources to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects. The Lynnwood Link Extension would mitigate impacts on ecosystem resources in accordance with the mitigation sequencing requirements established by NEPA, the Clean Water Act, and local critical areas ordinances.

L-007-049

Thank you for enclosing the City's earlier letter to Sound Transit expressing its views on the range of alternatives the Sound Transit Board was considering for the Draft EIS. Because this letter predates the Draft EIS, no detailed responses are provided here.

understand that the rationale provided for pairing these stations, rather than considering NE 145th Street instead of NE 155th Street is the need to maintain stop spacing of no less than one mile. It is Shoreline's contention that each of these stations needs to be evaluated on its own merits so that they can be fairly compared to one another.

Additionally, the inclusion of a fifth station in the North Corridor Transit project was not anticipated as part of the voter approved ST2 funding package. Should an additional station be approved at NE 125th Street/NE 130th Street, we want Sound Transit to ensure that its design and construction is adequately funded and will not result in the reduction or elimination of facilities, amenities or mitigation at the remaining two stations in the North King subarea.

Finally, the ST2 conceptual alignment includes parking garages at both stations with 500 parking stalls each. The City understands the need for parking facilities at the stations and would like Sound Transit to include evaluation of parking needs as part of the DEIS. As part of this evaluation, we are requesting that Sound Transit examine options that include both a single parking structure for each station and concepts that include multiple, smaller structures. It is the City's belief that while parking is needed, there may be a time in the future where less parking is needed, as riders utilize transit or non-motorized options to access the stations. In those circumstances, the garages may be converted to new uses or provide parking for new developments near the stations. By having parking garages at the two Shoreline stations, Sound Transit would be improving transit access to the region.

Thank you for your consideration of our comments. We look forward to continuing to work with Sound Transit and our neighbors on this important project. If you have any questions or need additional information, feel free to contact Alicia McIntire, Senior Transportation Planner, at 206.801.2483.

Sincerely,



Keith A. McGlashan
Mayor

cc. Joni Earl, CEO Sound Transit
Sound Transit Board
Shoreline City Council
Matt Sheldon, North Corridor Project Manager
Julie T. Underwood, City Manager
Mark Relph, Public Works Director
Scott MacColl, Intergovernmental Relations Manager
Alicia McIntire, Senior Transportation Planner



City of Mountlake Terrace
6100 – 218th Street SW, Suite 200
Mountlake Terrace, WA 98043-2222
425.778.1161
www.cityofmlt.com

September 12, 2013

Dear Sound Transit Board:

Thanks for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Lynnwood Link Extension. We appreciate the excellent work and countless hours that has gone into issuing this document.

Our City Council has long been an advocate for light rail for our region. Accordingly, we began planning for transit-oriented development in key areas of our community more than ten years ago. Our focus has been greatest in revitalizing our downtown/Town Center, which is near 236th Street SW, just east of I-5, as well as in developing the commercial/mixed use area immediately south of 236th and also just east of I-5. The latter area includes about 12 acres of vacant land in two parcels, which we have zoned for compact development up to 20 stories. In addition, we have adopted Comprehensive Plan and zoning changes to allow compact, mixed-use development along 220th Street SW, just west of I-5. This area includes about six acres of undeveloped property owned by the Edmonds School District.

L-008-001 We like Alternative B1 for its location of a station at 236th Street SW, close to the Town Center and Freeway/Tourist District. However, it does not support transit oriented development at 220th Street SW, where extensive development is possible.

L-008-002 We ask that you select Alternative B2 or B2A as the Preferred Alternative for rail alignment and station locations that will be included in the Final Environmental Impact Statement. Both alternatives, as with Alternative B1, support a station just east of I-5 at 236th. As with Alternative B1, this station location would provide the greatest opportunity for transit-oriented development and would support our community's Town Center vision. In addition, Alternative B2 has the light rail line crossing from the east side of I-5 to the west side (where at some point it needs to be located anyway to accommodate the Lynnwood connection) in a way that makes it possible for a station to be added at 220th in the future. Alternative B2A is the same as B2 except that it includes actually building the station at 220th.

L-008-003 The alternative we do not favor as the Preferred Alternative is Alternative B4. It provides light rail mostly in the freeway median and would have at least 1,000 less riders daily than any of the other three alternatives for the B section of Lynnwood Link. This is the least supportive of transit-oriented development and downtown revitalization.

We look forward to continuing our partnership and seeing light rail constructed in Snohomish County to attract the greatest ridership possible.

Regards,

Jerry Smith, Mayor

cc: Mountlake Terrace City Council
Scott Hugill, Interim City Manager
Shane Hope, Community and Economic Development Director

L-008-001

Thank you for your observations on Alternative B1.

L-008-002

Thank you for stating your preference for Alternative B2 or B2A. A modified version of Alternative B2 is part of the Preferred Alternative. The modification shifts the alignment west to avoid impacts to the I-5 ramps. The Final EIS also includes an optional station south of 220th Street SW and a 200-car surface parking lot on the site of the former Melody High School.

L-008-003

Thank you for your comment stating your objections to Alternative B4.



EDMONDS SCHOOL DISTRICT

20420 68th Ave. W., Lynnwood, WA 98036-7400
<http://www.edmonds.wednet.edu>

Stewart Mhyre, MBA, CSB.
Executive Director
Business & Operations

Serving the communities and students of Brier, Edmonds, Lynwood, Mountlake Terrace, Woodway and unincorporated Snohomish County

September 20, 2013

Sound Transit DEIS
Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

LynnwoodLinkDEIS@soundtransit.org

Dear Sound Transit Board,

Thank for the opportunity to comment on the Draft Environmental Impact Statement for the Lynnwood Link Extension. I appreciate the numerous occasions for input into the process.

After reviewing all of the alternatives, I have the following feedback for your consideration.

- L-009-001** 1. Select Alternative B2, putting the Transit Center stop to the east of the current Mountlake Terrace Transit Station.
- L-009-002** 2. I prefer Alternative B2 or B2A with the alignment going across 220th to the west of the freeway with a possible future transit stop at 220th.
- L-009-003** 3. Approve the City of Lynnwood's C3 Modified Alternative to be incorporated as part of the Final EIS for the Lynnwood Link Extension. Because of the extensive impact this alternative has for Edmonds School District and its planned use of this property for a Maintenance and Transportation facility, I ask that the District be invited to be a participant in the engineering and planning process of this alternative.

As stated in Section 4.1.2, Long Term Impacts, Segment C, Sound Transit will need to mitigate the impacts to our planned use for this property. The effected facility will most likely be in operation during the construction phase of the C3 Modified Alternative as well as when the link extension is operational.

I look forward to continuing to work with the staff of Sound Transit as they move closer to seeing the much needed Lynnwood Link Extension become a reality.

Sincerely,

Stewart Mhyre, MBA, CSBA
Executive Director – Business & Operations

Cc: Shane Hope, Community & Economic Development Director-City of Mountlake Terrace
David Kleitsch, Economic Development Director-City of Lynnwood

• OUR MISSION •

To ADVOCATE for all students by PROVIDING a learning environment which EMPOWERS students, staff and the community to MAXIMIZE their personal, creative and academic potential in order to BECOME lifelong learners and responsible world citizens.

L-009-001

Thank you for stating a preference for Alternative B2 and a possible future transit station at 220th Street SW. A modified version of Alternative B2 is part of the Preferred Alternative. The modification shifts the alignment west to avoid impacts to the I-5 ramps. The Final EIS also includes an optional station south of 220th Street SW and a 200-car surface parking lot on the site of the former Melody High School.

L-009-002

Thank you for stating your preferred alignment. See the response to comment L-009-001 describing the Sound Transit Board's Preferred Alternative.

L-009-003

Sound Transit appreciates the participation of the District in reviewing potential refinements in Segment C that would reduce potential impacts to the District's property. Sound Transit involved the Edmonds School District in meetings with the City of Lynnwood in the development of modified Alternative C3 that is evaluated in the Final EIS. The Final EIS also provides further detail on how Sound Transit would work with the City and the School District during final design and in construction planning to minimize impacts to the District's operations.



CITY OF LYNNWOOD

RESOLUTION NO. 2013 - 10

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LYNNWOOD, WASHINGTON MAKING A RECOMMENDATION FOR A PREFERRED ALIGNMENT & STATION LOCATION FOR THE SOUND TRANSIT LYNNWOOD LINK LIGHT RAIL EXTENSION TO LYNNWOOD AND FORWARDING CITY COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, In 2008, the voters authorized Sound Transit to proceed with an expansion of their Light Rail Transit system to include service to Lynnwood (Lynnwood Link) under ST2; and

WHEREAS, ST2 supports the policies of the Puget Sound Regional Council Vision 2040, which identifies Lynnwood as a Regional Growth Center, including the City Center, serving as a primary framework for regional transportation and economic development planning; and

WHEREAS, ST2 will provide Light Rail Transit service connections as an alternative transportation system between Lynnwood and Seattle, University of Washington, Bellevue and SeaTac Airport regardless of weather or traffic conditions; and

WHEREAS, if the voters approve the third phase of light rail expansion (ST3), Light Rail Transit would be extended from Lynnwood to Everett thereby further tying the region together and furthering the importance of the Lynnwood Regional Growth Center including the Lynnwood City Center; and

WHEREAS, ST2 Light Rail Transit will benefit Lynnwood residents and businesses and will serve as a catalyst for economic development in the Lynnwood City Center area; and

WHEREAS, Sound Transit has developed three alternative alignments and station locations for bringing light rail into the Lynnwood Transit Center and has analyzed their impacts in a Draft Environmental Impact Statement; and

WHEREAS, the City of Lynnwood held three, well attended public information meetings on the Lynnwood Link alignment and station location alternatives and received significant input from residents and businesses; and

L-010-001

Thank you for providing the City Council's recommendation for a preferred alignment and station location for the proposed Lynnwood Link Extension and providing comments on the Draft EIS. As you know, Sound Transit continued to work with the City and others to define a modification to Alternative C3 that incorporated this suggestion, and it has been analyzed in the Final EIS.

L-010-001

WHEREAS, the proposed C1 alignment is located directly across 52nd Ave. from a single family neighborhood containing hundreds of affordable homes, requires the removal of a condominium development and numerous businesses along 200th St., is across 200th St. from several affordable apartment and condominium complexes, all of which would be adversely impacted by noise, vibration, decline in property value, and other impacts from the elevated tracks; and

WHEREAS, the proposed C1 alignment is routed through a significant recreational resource in the form of the City's Scriber Creek Park that provides a place to experience nature in close proximity to Lynnwood's City Center; and

WHEREAS, Scriber Creek Park was acquired using Conservation Futures funding from Snohomish County, and WHEREAS, the proposed C2 alignment results in impacts similar to C1 to homes along 52nd Ave, impacts businesses along Cedar Valley Road, while not located within Scriber Creek Park and trail they are impacted due proximity, impacts Scriber Creek wetlands adjacent to the Park, and results in noise, vibration, and visual issues to these sensitive areas, and

WHEREAS, the proposed C3 alignment would result in significant property damage and loss of development potential on the City Center block located east of 44th and adjacent to I-5, would result in a station location remote from the bus transit center, existing residential development, public streets and City Center, would require reconstruction of the existing bus loading areas at great additional expense, would impact the City's ability to maintain and expand Sanitary Sewer Lift Station 10, and fails to address flooding and odor issues in the immediate area; and

WHEREAS, the City has developed a "C3 Modified" alignment and station location that offers the benefits of C3 in terms of avoiding impacts of C1 and C2 while also addressing the issues associated with C3; and

WHEREAS, the City of Lynnwood wishes to make Sound Transit aware of the City's preferences on potential alignments and station locations to insure they will be considered by the Sound Transit Board for their determination of a "Preferred Alternative".

THE CITY COUNCIL OF THE CITY OF LYNNWOOD, WASHINGTON, RESOLVES AS FOLLOWS:

1. That based upon a detailed analysis of the alternatives, review of the Draft Environmental Impact Statement and extensive public outreach efforts by the City, the Council is hereby expressing its preference for:

L-010-001

- "C3 Modified" that minimizes impacts to Lynnwood residents, businesses, development potential, parks and environment, while still offering the transportation benefits of Light Rail Transit service and the implementation of economic development planning policies.

2. That the City and Sound Transit will work directly together on "C3 Modified" as the preferred alternative Lynnwood Link Final Environmental Impact Statement to address mutual and respective goals for Sound Transit ST2 and the City of Lynnwood City Center Plan as part of the PSRC Regional Growth Center Strategy.

PASSED BY THE CITY COUNCIL the 23rd day of September, 2013

Don Gough
Mayor

ATTEST/AUTHENTICATE:

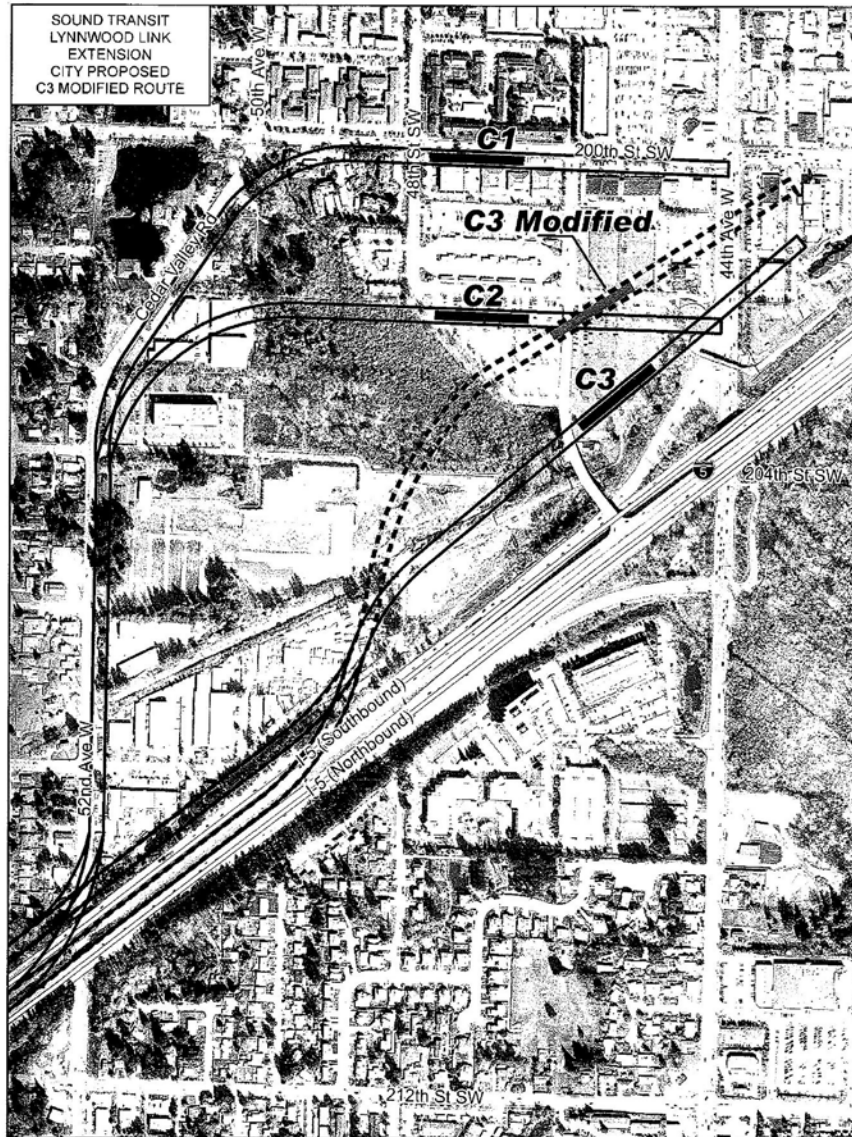
Lorenzo Hines

Finance Director, City Clerk

Resolution Number:

Approved by Council:

Vote:





City of Seattle

Seattle Department of Transportation
Seattle Department of Planning and Development

Peter Hahn, Director
Diane Sugimura, Director

September 20, 2013

Joni M. Earl
Chief Executive Officer
Sound Transit
401 S. Jackson St.
Seattle, WA 98104-2826

RE: Lynnwood Link DEIS comments

Dear Ms. Earl:

The City of Seattle is excited about the expansion of the regional transit system with the Lynnwood Link Extension. We appreciate the opportunity to comment in more detail on the proposed alignment and station alternatives presented in the DEIS. This letter represents joint recommendations from the Seattle Department of Transportation (SDOT) and the Seattle Department of Planning and Development (DPD). In addition to the alignment and station recommendations in this letter, you will also find a listing of more detailed comments, including coordinated comments from other city departments.

- L-011-001** • **Seattle supports the A1 alignment option through Seattle** (*this alignment recommendation does not include the proposed A1 station locations*). This alignment best supports Sound Transit's Sustainability Plan by reducing noise and long-term visual impacts of adjacent neighborhoods, reducing private property impacts, replacing the 117th bridge benefitting bike and pedestrian connections, and reconfiguring the NE 130th freeway off-ramp addressing a high accident location. The related recommendations below further support and enhance the A1 track plan through Seattle.
- L-011-002** ○ Work closely with SDOT and the Latvian Evangelical Lutheran Church and Center at 11710 3rd Avenue NE to maintain Seattle right-of-way to the facility. It is a priority to maintain access to this cultural, religious, and education center at the current location.
- L-011-003** ○ In the reconstruction of 1st Avenue NE, work with Seattle to retain the trees and green space on the east side of 1st between 113th and 115th Street, which serves as a buffer to the Northgate West Condominiums.
- L-011-004** ○ In the reconstruction of 1st Avenue NE and the 117th Street bridge, provide a 14' shared use bike and pedestrian facility on the north side of the bridge and a 8' sidewalk on the south side of the bridge connecting into similar facilities on the relocated 1st Avenue NE. Ensure these facilities connect to the existing bicycle trail at NE 116th Street.

L-011-001

Thank you for your comment stating a preference for Alternative A1, including the features that the City finds most promising. The Sound Transit Board identified a Preferred Alternative based on Alternative A1, but modified some of the alternative's features.

L-011-002

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the results of additional engineering Sound Transit undertook to avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions has been maintained, although a small portion of land on the property's edge would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative; and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property would require compensation to the property owner in accordance with Sound Transit policy and with federal and state law.

L-011-004

- With the significant light rail construction adjacent to 5th Avenue NE between 130th Street and 145th Street, include a sidewalk and bicycle lane on the west side of 5th Avenue NE between 130th and 145th Street. The DEIS identifies a lack of adequate facilities and access, particularly during nighttime hours.

L-011-005

- **Seattle supports including the 130th Street Station in Segment A, as a station configuration constructed as shown on Alternative A5/A10 – Option 1 (page 65 of 142 of the DEIS Conceptual Plans), a retained cut, center platform station. This option does not include surface parking north of the station.** This neighborhood-oriented station expands access to the regional transit system for Seattle residents and provides a unique opportunity for bus, bike and pedestrian access to several adjacent neighborhoods and communities. Per the “Lynnwood Link Extension Station Area Transit-Oriented Development Potential” report prepared by Sound Transit and dated April 2013, the 130th Street Station ranked highest in the Station Access category of any of the stations in Segment A. Additional points below support this recommendation.
 - Within Segment A, the 130th Street Station provides Sound Transit and King County Metro the best opportunity to provide efficient and reliable bus to rail and rail to bus connections on adjacent roadways with less traffic congestion and good connections to the relatively dense residential areas in Seattle’s Lake City and Bitter Lake neighborhoods.
 - After the 185th Street Station, the 130th Street Station offers Sound Transit the highest ridership of the stations studied in Segment A. The ridership scenario with both a 130th Street Station and a 145th Street station indicates 3,200 average weekday riders at 130th and 2,200 average weekday riders at the 145th Street station.
 - This 130th Street Station is supported as a bicycle hub with City-proposed cycle track facilities on 130th Street, Roosevelt Way, 125th Street, and 5th Avenue NE incorporated in the draft update of the City Bicycle Master Plan.
 - By including both the 130th and 145th Street stations, ridership in Segment A benefits by an additional 400 daily boardings, providing increased ridership to Sound Transit from both Seattle and Shoreline.
 - The 130th Street Station supports Sound Transit’s sustainability objectives by reducing additional SOV and bus trips to the congested Northgate Urban Hub. DEIS modeling suggests that up to 3,200 average daily trips would be captured at the 130th Street Station. Without this station, a percentage of those trips would contribute to congestion on other streets or require additional travel time on buses connecting to the Northgate Station.

The City of Seattle will continue to partner with Sound Transit on the implementation of the Lynnwood Link Extension. We look forward to working with you to expand the regional transit system and

L-011-003

The recommended action is consistent with the mitigation measures on Draft EIS page 4-91. Section 4.5.6 of the Final EIS has further details on the mitigation approach, and identifies areas where tree retention may be a possibility.

L-011-004

Sections 3.15 and 2.5 of the Final EIS identified pedestrian and bicycle improvements on 5th Avenue between NE 130th Street and NE 145th Street, and also clarify how Sound Transit would work with the City regarding other improvements during final design. The Board's Preferred Alternative includes an alignment to the east of the 117th Street bridge, which avoids the need to replace the bridge.

L-011-005

Sound Transit appreciates the summary of the benefits the City sees with a station at NE 130th Street. The Final EIS includes an option for a station at NE 130th Street.

providing safe, efficient and sustainable transportation choices for our residents and regional riders. If you have any questions about these recommendations, please don't hesitate to contact either of us or Michael James at michael.james2@seattle.gov or (206) 386-4012.

Thank you again for the opportunity to comment.

Sincerely,



Peter Hahn
Director, Department of Transportation
City of Seattle



Diane M. Sugimura
Director, Department of Planning and Development
City of Seattle

Attachment: Seattle's Lynnwood Link Detailed Comment Listing

C: Tom Hauger
Michael James

Seattle's Lynnwood Link Detailed Comment Listing
September 20, 2013

In addition to the Lynnwood Link comment letter sent jointly from Peter Hahn, Director of the Seattle Department of Transportation (SDOT) and Diane Sugimura, Director of Seattle's Department of Planning and Development; the additional comments below are generally more detailed in nature and include additional comments from city departments that wished to incorporate their specific comments collectively.

- | | |
|------------------|---|
| L-011-006 | <ol style="list-style-type: none"> 1. To preserve existing in-city housing stock, the City of Seattle recommends that demolition of existing housing units be mitigated through production of an equivalent number of comparable housing units in the vicinity of any demolished unit. (Office of Housing) 2. The City further requests Sound Transit conduct a household income survey to determine the income levels of the households currently occupying the housing identified for demolition. This information is critical to develop a just and fair mitigation strategy for households at or below 50% of area median income. A mitigation strategy should include providing relocation expenses for low-income households and contributing to the replacement of units at or below the affordability levels of the demolished units. Contributions to the replacement of affordable housing could be in the form of direct subsidy to the production or preservation of affordable housing in the near vicinity or donation of Sound Transit surplus property for the development of affordable housing. (Office of Housing) |
| L-011-007 | <ol style="list-style-type: none"> 3. The Department of Planning and Development acknowledges the refinements suggested in the pre-DEIS review and included in the DEIS relating to the land use map and zoning maps, comprehensive plan and other plan documents. (DPD) |
| L-011-008 | <ol style="list-style-type: none"> 4. In section S.6.1 (Transportation) revise the last sentence to read, "...traffic management, or other strategies including bicycle, pedestrian and transit improvements." (SDOT) |
| L-011-009 | <ol style="list-style-type: none"> 5. In section S.6.3 (Environmental Justice), impacted populations (in Seattle) would only benefit from improved access to transit if there is a station that offers access that is convenient and reliable. The 130th St. Station best provides convenient access to members of impacted populations in Seattle. (SDOT) |
| L-011-010 | <ol style="list-style-type: none"> 6. In section S.7.1, SDOT disagrees that the 130th St. Station "would not notably increase system ridership because it would cause riders to shift from the Northgate Station." There are a few reasons for this. <ol style="list-style-type: none"> a. Ridership modeling assumed only one bus route feeding the 130th Station. By way of comparison, the 145th Station had four routes feeding it. In modeling the A10/A11 configuration (with stations at 130th and 145th), 130th had 1,000 more average weekday boardings than 145th with only one bus feeder route. With two or three buses feeding the 130th St. station, ridership would be noticeably more pronounced. |

L-011-006

Sound Transit recognizes the City's concern for maintaining an adequate supply of affordable housing units within the city. Sound Transit's policy provides for a fair and equitable means of addressing real property impacts across its projects, and this includes a commitment to relocate displaced individuals in a manner consistent with state and federal law, as stated in Section 4.1. Sound Transit has successfully implemented this policy on several of the Link light rail projects developed within the City of Seattle, and which affected more properties than are potentially impacted by the Lynnwood Link Extension. While Sound Transit will endeavor to relocate displaced parties in the same neighborhood or area, the work is done in consultation with the displaced parties, who may or may not choose to stay in the same area. They will, however, be placed in housing that is affordable to them; this effort includes interviews with the affected parties to help determine affordability, as well as compensation and assistance programs that meet individualized needs and ensures safe and sanitary dwellings. Sound Transit generally does not enter into negotiations with affected parties until after the completion of the NEPA/SEPA process. Sound Transit may consider opportunities for making surplus property available for redevelopment, but this would not be considered as mitigation for displacements, which would be fully mitigated through the existing policy commitment defined in Section 4.1 of the Final EIS and compliance with state and federal requirements.

L-011-007

Sound Transit appreciated the City's review and suggestions leading up to the Draft EIS.

L-011-008

Sound Transit has revised the sentence generally as suggested for the Final EIS.

Seattle's Lynnwood Link Detailed Comment Listing
September 20, 2013

- | | |
|------------------|---|
| L-011-010 | <ul style="list-style-type: none"> b. Metro and the DEIS have indicated that bus routes can be adjusted to better feed stations, increasing regional ridership and efficiency. c. This assumes the same number of regional riders would endure congested drives or riding bus routes travelling into the much more congested Northgate Urban Hub as would bus, bike, walk or kiss and ride a shorter distance to a neighborhood station at 130th. d. Regional rail modeling does a good job of capturing walk access, but it does not do an accurate job of capturing bicycle access to stations. With the proposed bicycle improvements in the 130th station area, we believe this market is being under reported for model year 2035. e. This point is contrary to information in the Transportation Technical Report, page 5-9 (see comment 13 below). <p>7. Table 4-18 in the Transportation Technical Report supports routing more buses along 130th and 125th Streets to a station rather than along 145th Street based upon the reported Daily Traffic Volume and available lanes. (SDOT)</p> |
| L-011-011 | <p>8. In section 4.5.1 of the Transportation Technical Report, SDOT concurs with the assessment of the lack of ADA sidewalks on the west side of 5th Avenue NE between NE 130th and NE145th and recommends installing ADA compliant curbs and sidewalks with the reconstruction of the street and freeway frontage.</p> |
| L-011-012 | <p>9. Section 4.5.2 (Bicycle Facilities) of the Transportation Technical Report - In the FEIS, SDOT recommends inventorying all arterials within 3 (not 1) miles of each station. This is in alignment with new direction from the FTA relating to eligible bicycle infrastructure funding.</p> |
| L-011-013 | <p>10. Table 4-34 in the Transportation Technical Report supports reconfiguring the NE 130th Street northbound off-ramp to 5th Avenue NE to improve safety as proposed in alignment A1.</p> |
| L-011-014 | <p>11. Section 5.2 in the Transportation Technical Report supports the recommendation for Sound Transit to work closely with King County Metro and SDOT to develop an efficient bus restructure capitalizing on the opportunities of the 130th St. Station. (SDOT)</p> |
| L-011-015 | <p>12. Table 5-8 in the Transportation Technical Report – SDOT disagrees with the assumptions in the assumed feeder bus service to light rail stations. In the preparation of the FEIS, work closely with SDOT and King County Metro to develop an updated feeder network to ensure the most efficient routing and understanding of bus facilities such as stops and speed and reliability improvements that can be coordinated with Seattle and Metro.</p> |

L-011-009

Sound Transit notes your comment. Thank you.

L-011-010

The conceptual service plans used for the Draft EIS analysis was based on assumptions developed in coordination with the transit service providers. Sound Transit has updated its ridership forecasts for all alternatives in the Final EIS to incorporate updated land use forecasts, although changes to the assumed service plan have been limited. This includes updated forecasts for the NE 103th Street Station, which is an option for the Preferred Alternative. While it is accurate that the regional rail transit model does not specify bicycle access shares, the modeling inherently includes all riders across modes. While this may slightly overstate the shares of the other access modes by not separating out bicycles, it is appropriate for the purposes of an EIS analysis and the conceptual level design efforts being conducted at this stage of the project.

L-011-011

Sound Transit will meet ADA standards for any facility that it constructs or modifies, and will work with the City of Seattle during final design to confirm the specific design approach for features such as sidewalks and curbs.

L-011-012

While Federal Register Vol 76, No. 161 identifies a bicycle catchment area of 3 miles to identify streets with a de facto physical and functional relationship to transit, and therefore eligible for FTA funding, it does not require high capacity transit projects to analyze the full area in an EIS or incorporate improvements covering that area. Pedestrian and bicycle facilities developed as part of the project, as well as other access features at Lynnwood Link Extension stations, will be developed

Seattle's Lynnwood Link Detailed Comment Listing
September 20, 2013

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| L-011-016 | 13. Page 5-9, third bullet, in the Transportation Technical Report, is contrary to Section S.7.1 (discussed in comment 6 above). "Adding a third Segment A station would result in a net increase of 400 daily boardings in the segment because it would provide more access points to the transit market." Revise the summary language per this information. (SDOT) |
| L-011-017 | 14. Section 5.2.2. in the Transportation Technical Report, supports comment 12 (above), specifically, "Near the NE 145 th Street Station, the impact of additional traffic associated with that station would contribute to already congested conditions (LOS E-F), which could impair the ability of local bus service to provide reliable access to the station." (SDOT) |
| L-011-018 | 15. Section 5.2.2., page 5-32 in the Transportation Technical Report – for alternatives A5 and A10, write out the alternatives specific to the correct streets, do not say that impacts would be the same as another alternative on a different street. (SDOT) |
| L-011-019 | 16. Section 5.5.1. in the Transportation Technical Report – Explain how bicycle trips and bicycle facilities influence this evaluation. Explain how bicycle trips are factored in Table 5-31. If not explained in this section, identify how and where they are considered for trip generation. (SDOT) |
| L-011-020 | 17. Page 5-96 of the Transportation Technical Report; clarify if the planned Jackson Park Perimeter Trail would meet any ADA requirements for a trail, sidewalk or shared use path. (SDOT) |
| L-011-021 | 18. The Transportation Technical Report, page 5-123 states, "If a station is selected for NE 145 th Street, the station design and design of adjacent streets would need to address the current and expected increase in conflicts between vehicles and between travel modes near the station, as reflected in the existing High Accident Locations (HALs)." Define the alternatives for mitigating impacts. Is reduction of at station parking an alternative to reduce congestion impacts? (SDOT) |
| L-011-021 | 19. SDOT recommends the following refinements and/or revisions to sheet 65 of the DEIS Conceptual Plans: <ul style="list-style-type: none"> a. Expand the pedestrian plaza at the northwest corner of NE 130th St and 5th Avenue NE to accommodate a bus shelter/weather protection b. Design to the station and bus drop off to accommodate multiple routes and stop locations. For the FEIS, discuss alternative bus feeder alternatives and facility needs based upon meetings with King County Metro and SDOT. c. Include 8 kiss-and-ride drop off spaces |

consistent with the Board-adopted System Access Policy (Resolution R2013-03), which provides criteria to be used in defining access features throughout the system. Many of these elements will be further defined during final design and permitting, as Sound Transit continues to coordinate with local agencies to determine station access features and to seek further opportunities to partner with the other agencies to maximize the benefits of this major transit investment.

L-011-013

An option with the reconfigured NE 130th Street northbound off-ramp is part of the Preferred Alternative for Segment A. As stated in Section 3.2.8 of the Final EIS and Section 5.8 of the Transportation Technical Report, this improvement is likely to improve safety at this location.

L-011-014

As noted in Chapter 3, Section 3.2.2 of the Final EIS, Sound Transit would coordinate with King County Metro and Community Transit on potential local bus service modifications as the project enters final planning leading to operation. However, the changes in services would be made by the local transit agencies, who have their own policies and processes for considering service revisions.

L-011-015

The assumptions used for the Draft EIS were developed in coordination with King County Metro and were intended to help develop ridership forecasts for each station. These draft transit integration plans were not intended to fully define the range of transit improvements that King County Metro or others might undertake in connecting corridors. Consistent with the approaches used for other projects that Sound Transit has implemented, including the light rail lines in place or in development in the city, this detailed integration planning would occur after the Final EIS is complete and the project is in preparation for

Seattle's Lynnwood Link Detailed Comment Listing
September 20, 2013

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| L-011-021 | d. Design multiple drop off parking spaces that do not require all trips to use 5 th Avenue NE (locations may require use of existing signalized pedestrian crossings) |
| L-011-022 | 20. Suggest including an assessment of public places that are enhanced by light rail station access. A criteria that documents well established neighborhoods is also recommended. This should be a part of the transit supportive plan and policy documentation. (SDOT) |
| L-011-023 | 21. With construction impacting I-5, 1 st Avenue NE, 5 th Avenue NE, Roosevelt Way NE and NE 130 th Street, protect and enhance drainage, including waters that may influence the Thornton Creek water course. (SPU)

22. Coordinate future design efforts impacting drainage, such as new curb, gutter and sidewalks with Seattle Public Utilities (SPU) and SDOT. (SPU) |

operations. King County Metro has revised its service integration concepts for a 130th Street Station for the Final EIS to include additional service, and the results of those changes are reflected in the Final EIS forecasts and updated station design.

L-011-016

The summary text has been updated for the Final EIS.

L-011-017

For the Preferred Alternative, the Final EIS incorporates improvements to help minimize potential travel delays that could affect local bus service to the station. The other alternatives identify these potential improvements as mitigation.

L-011-018

Sound Transit has updated the Transportation Technical Report, and has revised text to clarify the locations identified in the comment.

L-011-019

Bicycle trips were not factored into the pedestrian LOS analysis, because detailed bicycle access projections were not available or necessary to support project planning at this stage of the project. While the Sound Transit model does not address bicycle access shares, the modeling inherently includes all riders. Pedestrians walking between rail and their parked bicycles are reflected in the overall numbers contained in Table 5-31 of the Transportation Technical Report.

Sound Transit is not proposing an alteration to the Jackson Park Perimeter Trail.

L-011-020

The Final EIS Chapter 3, Transportation, and the Transportation

Technical Report and Chapter 3 of the Final EIS have the results of an updated analysis of the NE 145th Street Station area using microsimulation software. The Preferred Alternative incorporates design measures for local street improvements that would address the added traffic related to the station and park-and-ride, and improved signalization and an added signalized intersection at the I-5 ramps also helps address a known accident location. The simulation software evaluates the effectiveness of transportation improvements incorporated within the design for the Preferred Alternative, as well as for other mitigation measures described in the Final EIS. The Final EIS also has additional language in mitigation explaining how Sound Transit will work with local agencies during final design to develop and implement mitigation details.

L-011-021

Sound Transit will refine details such as the plaza size, weather protection at the station and bus platforms, and further detail on bus transit service assumptions and requirements following the Final EIS, if this station is included as part of the project.

L-011-022

Section 4.4 and Appendix C now include a list of public places that would be near each station. Neighborhoods served are also described in Section 4.4, although Sound Transit did not attempt to characterize neighborhoods in qualitative terms. Many of the Draft EIS public comments served to inform the Sound Transit Board of how members of those neighborhoods perceived the project as either benefiting or impacting their communities. The Transit Oriented Development Assessment conducted for the project is not part of the EIS but was updated as part of other documentation for the project to reflect the Preferred Alternative.

L-011-023

As described in Section 4.9.6 of the Draft EIS, the project would comply with all federal, state, and local regulations protecting water quality. Approaches will include project planning, design, and the application of Best Management Practices (BMPs). Sound Transit will coordinate with Seattle Public Utilities regarding future design efforts for drainage where applicable.



Joyce Elamoff, Chief Executive Officer

September 23, 2013

Sound Transit, Draft EIS Comments
C/o Ms. Lauren Swift
401 S. Jackson St
Seattle, WA 98104

Dear Ms. Swift:

- L-012-001** Community Transit strongly supports the Lynnwood Link Extension (Link). Once opened, it will significantly increase mobility options for Snohomish County residents by providing fast, frequent, and reliable service between Snohomish County and the greater Puget Sound Region. Community Transit will do our best to effectively serve Link stations in Snohomish County. Our comments in the current environmental review process focus on mitigation to preserve mobility during construction and system design elements that will enable effective bus-rail integration.
- L-012-002** Surveys suggest 40 percent of all Snohomish County residents commuting to jobs in downtown Seattle use transit via Interstate-5 (I-5). Link construction impacts on general purpose traffic will further increase transit demand. Protection of this transit market needs to be a top priority in construction mitigation. Today's regional bus riders are the basis for the future light rail market.
- Mitigation should provide service equal to or better than what is provided today. I-5 is already congested, in both general purpose and HOV lanes, impacting speed and reliability of transit. Where I-5 lane closures are called for, these should occur on nights and weekends when demand is reduced. Where HOV lane or direct access ramp impacts are unavoidable, an alternative priority path for transit should be implemented. Accommodating higher transit demand during construction will likely require mitigation in the form of funding for additional buses and service hours, as well as transportation demand management (TDM) strategies. With effective mitigation, transit demand will continue to grow, providing a strong, healthy market at the opening of Link light rail service to Snohomish County in 2023.
- L-012-003** It is understood that most users of Link will access the system via walk or bus. The final system design should prioritize effective integration with the bus network, safe, convenient pedestrian access and potential for transit oriented development (TOD). The number and location of stations, should meet Sound Transit's Long Range Plan vision to provide reliable, rapid, and efficient service to meet the existing and projected demand for regional travel within the corridor and to other urban centers in the central Puget Sound. With this framework in mind, Community Transit's main input on design includes:
- L-012-004**
- Prefer Lynnwood Transit Center alternative C1, along 200th St SW, which provides effective pedestrian access, transit integration and TOD potential.
- L-012-005**
- Concern with Lynnwood Transit Center alternative C3 Option 1 (along I-5), which would be difficult for transit to serve, has poor pedestrian access and little TOD potential.
 - Concern with Lynnwood Transit Center alternative C3 Option 2. It provides better transit integration, but still has long walks for pedestrians and little TOD potential.

1000 Henderson Rd. Everett, WA 98203-5834 ph (425) 348-7100 fx (425) 348-2319 TTY Relay: 711 www.communitytransit.org

L-012-001

Thank you for your comment stating support for the Lynnwood Link Extension and for Community Transit's intent to effectively serve Link stations in Snohomish County.

L-012-002

Sound Transit recognizes the need to support and maintain transit markets during construction. However, the project does not anticipate that impacts to I-5 will occur throughout the construction period, and many of these impacts would be reduced by working closely with WSDOT, FHWA and the transit agencies operating along the corridor to develop a coordinated plan to maintain mobility during the shorter periods when traffic would be affected by construction affecting the freeway itself. This is consistent with the construction approach (Section 3.3) and the mitigation measures (Section 3.6) described in the Final EIS. Section 3.6 identifies potential mitigation to be developed with its partners, including service increases, service modifications, or temporary service improvements. The Final EIS also provides more definition of the location and duration of closures and their related impacts, as well as minimization measures such as timing closures to be in off-peak periods, evenings, or weekends where possible.

L-012-003

Comment noted. Sound Transit agrees with these observations.

L-012-004

Thank you for your comment stating a preference for Alternative C1.

L-012-005

The Final EIS includes a modified Alternative C3 as part of the Preferred Alternative. The modifications help address the access and TOD development issues that this comment raises.

L-012-006

- Note that the 220th Street SW station (B2A) is not a focus of existing or planned bus service, unlike the nearby hubs at both Lynnwood Transit Center and Mountlake Terrace Transit Center.
- Prefer the Mountlake Terrace elevated station crossing over NE 236th (B1, B2), which provides the best pedestrian access, transit integration and TOD potential.
- Concern with Mountlake Terrace alternative B4 (Freeway Station), which has compromised market potential and construction impacts that would be very costly to mitigate
- Note that the assumption of *Swift* BRT service to the 185th St Station requires transit priority infrastructure along NE 185th between Aurora Avenue and I-5 to ensure speed and reliability

L-012-007

L-012-008

L-012-009

Our detailed comments on construction impacts and system design are attached to this letter.

L-012-010

As stated above, Community Transit is a strong supporter of this light rail extension to Snohomish County. We appreciate the opportunity to comment on the DEIS and are hopeful that Sound Transit will be visionary in their selection of design alternatives that provide the most effective integrated transit system for the future mobility of the Puget Sound region.

We also look forward to coordinating with Sound Transit as they identify funding and strategies to mitigate impacts to existing transit markets during construction of Link.

Sincerely,



Joyce Eleanor
Chief Executive Officer

kegt

Enclosure

cc: Community Transit Board of Directors
Community Transit Corridor Working Group

L-012-006

Sound Transit recognizes that the 220 Street SW Station is not the focus of Community Transit's existing or planned transit service, but the presence of a station at that location has been suggested by local jurisdictions and others because the arterial is a major corridor serving Edmonds and other communities. The Preferred Alternative includes an option for a station at that location, and its benefits would be higher with connecting transit service.

L-012-007

Thank you for your comment stating a preference for the elevated station featured in Alternatives B1 and B2.

L-012-008

Comment noted. Your observation of the transit impacts during construction for the freeway station being difficult or expensive to mitigate are consistent with the Draft EIS findings, although mitigation options would be available.

L-012-009

Although Sound Transit agrees that transit priority treatments might benefit a Swift extension from Aurora Village Transit Center to NE 185th Street Station, Sound Transit has not included the improvements as part of the Lynnwood Link Extension. Sound Transit supports transit improvements that would serve the station, and will continue to work with Community Transit, as stated in Section 3.2.2 of the Draft EIS.

L-012-010

Thank you for your comments and collaboration on the Lynnwood Link Extension.

**Community Transit Comment Detail:
Sound Transit - Lynnwood Link Extension DEIS**

Segment A (Seattle to Shoreline)

- L-012-011** | Station Alternatives:
If it is decided that Community Transit's *Swift* bus rapid transit (BRT) system is the appropriate fixed-route bus service to feed the 185th Street Station in Shoreline, BRT infrastructure needs to be provided. BRT infrastructure can include high occupancy vehicle (HOV) or Business and Transit (BAT) lanes, signal priority, and intersection improvements, such as queue jumps to maintain speed and reliability along NE 185th Street between the Link station and Highway 99.
- L-012-012** | Construction Impacts:
I-5 lane closures are possible within Segment A if Alternatives A1, A5, or A10 are chosen: one-lane in each direction on I-5 could be closed for up to 2 months. The possible 24-hour I-5 lane closures would occur at NE 117th Street, NE 185th Street, and NE 130th Street. The NE 130th Street northbound off-ramp might also be closed. I-5 lane closures would further increase congestion and delay. As noted in our letter, construction mitigation needs to provide transit with an ongoing priority path in this corridor.

Segment B (Shoreline to Mountlake Terrace)

- L-012-013** | Station Alternatives:
Alternatives B-1 and B-2 (elevated station crossing 236th St SW): Community Transit prefers these alternatives because the proposed station location provides for efficient transfers between Link light rail and fixed-route bus service. It has the greatest potential for transit oriented development (TOD) to occur around the facility, and provides for good pedestrian connectivity between the station, Mountlake Terrace Town Center, and the Freeway/Tourism sub-area just south of 236th St SW.
- L-012-014** | Alternative B-2A (station at 220th St SW): Community Transit's future network plans do not anticipate significantly increased bus service along 220th St SW. A station at this location is assumed to be primarily the focus of pedestrian access limited to the immediate vicinity.
- L-012-015** | Alternative B-4 (freeway station): Community Transit does not support this alternative because of the separation between the proposed Link station and fixed-route bus service, increasing the already long walk between the transit loop off 236th St. SW and the Freeway Station. The DEIS states this location will result in the loss 1,000 daily boardings. It has the least amount of potential to spur future TOD development and it would eliminate any future use of the existing freeway station for fixed-route bus service.
- L-012-016** | Construction Impacts:
I-5 lane closures within Segment B are possible for all proposed rail and station location alternatives during the construction activities to install support structures in the median, including the reconstruction of the NE 195th Street pedestrian/bike overcrossing, and reconstruction of 236th Street SW adjacent to the new station. As stated above, any short or long-term lane closures on I-5 will increase congestion causing additional delay. Construction of the elevated guideways could also impact signal operations on 236th Street SW. This could also add delay for vehicles, including buses, accessing I-5 to and from the Transit Center.

Community Transit – Lynnwood Link DEIS Attachments
September 23, 2013

1

L-012-011

As the project progresses into final design, Sound Transit will continue to coordinate with Community Transit and the City to encourage *Swift* service from Aurora Village to the NE 185th Street light rail station. However, the Lynnwood Link Extension project does not include specific transit priority or BRT improvements between the corridors leading to the station.

L-012-012

Please see Sections 3.3 and 3.6.9 of the Final EIS for further detail on the project's potential construction activities, impacts, and the mitigation plan for construction, including the mitigation approach for transit. While the emphasis is on the Preferred Alternative for each section, a similar mitigation approach would apply to other alternatives. However, it is important to note that these are assumptions on construction approach for the purposes of an EIS analysis of potential impacts and mitigation. The level of impacts, including their duration, depends on issues that will be further developed during final design, subject to FHWA and WSDOT approval, and also influenced by a contractor's approach to construction. The mitigation in Section 3.6.9 therefore emphasizes detailed coordination with the transit agencies and WSDOT as mitigation details are further refined.

L-012-013

Thank you for your comment.

L-012-014

The project would not begin service until 2023. Sound Transit recognizes this is within the period covered by Community Transit's Long Range Plan (2030). However, as outlined in Community Transit's Long Range Plan: *Thinking Transit First* (pages 23-24), Community Transit plans to serve productive route segments to local activity

L-012-016 The greatest impacts to transit will occur if the direct access ramps to the Mountlake Terrace Freeway Station are closed as proposed with Alternative B-1 (for up to 2 months) and B-2/B-2A (for between 2 and 12 months). Alternative B-4 would permanently close the Mountlake Terrace Freeway station at the beginning of construction. Such closures would have a significant impact on transit, requiring reroutes through the City of Mountlake Terrace, causing significant increases in travel time, requiring temporary bus stops, and further compounding the traffic delays that would be caused by lane closures on I-5.

It is imperative that transit service between Snohomish County and King County be protected during construction. Therefore, mitigation is required to maintain and/or improve the existing service levels during the construction phase of the Lynnwood Link Extension project. As stated earlier, transit demand is anticipated to increase as additional congestion negatively impacts general purpose travel lanes on I-5.

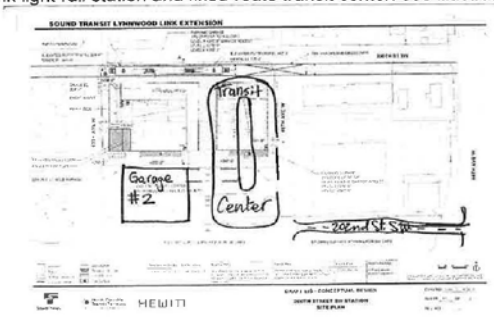
Mitigation required for Community Transit to maintain existing inter-county transit service for the construction of the Lynnwood Link Extension includes, but is not limited to, financial assistance for operating and capital expenses to increase service and/or provide reroutes as suggested as a construction mitigation strategy in the DEIS, maintain ingress and egress to the Mountlake Terrace parking garage, maintain ingress and egress to the Mountlake Terrace Freeway Station, use the late night I-5 lane closures option instead of 24-hour lane closures, maintain or improve HOV lane operations, and deployment of a very proactive TDM program.

Segment C (Mountlake Terrace to Lynnwood)

L-012-017 Station Alternatives:
Alternatives C-1: With modifications, this is Community Transit preferred station location because it provides for efficient transfers between Link light rail and fixed-route bus service. It has the greatest potential for transit oriented development (TOD) to occur around the facility, further building the transit market and it provides the best pedestrian connections of all there alternatives between the facility, the 196th Street Corridor and Lynnwood's City Center.

The following modifications are suggested:

- Flip the east parking garage with the transit center to further reduce the distance to transfer between the Link light rail station and fixed-route transit center: see illustration below.



Community Transit – Lynnwood Link DEIS Attachments
September 23, 2013

centers with an emphasis on transit centers and Link light rail stations. The plan also states that the local routes will be designed to coordinate with higher level of services, especially regional commuter express routes, Swift corridors, commuter rail, or light rail routes. The Long Range Plan specifically identifies 220th Street SW as a facility that provides a critical local link.

As stated in Section 3.2.2 of the Final EIS, Sound Transit anticipates partnering with Community Transit to consider local or regional service revisions integrated with light rail service for development as part of the Lynnwood Link Extension.

L-012-015

Sound Transit acknowledges Community Transit's concerns with Alternative B4, which include lower TOD potential, longer walks, and lower ridership.

L-012-016

Please see response to comment L-012-002.

L-012-017

Thank you for your comment stating a preference for Alternative C1 and providing reasons and proposed modifications for this alternative.

L-012-017	<ul style="list-style-type: none"> • Provide covered pedestrian pathways between Link, the parking garages, and the transit center. • Provide an elevated and covered pedestrian bridge from the Link Station to the north side of 200th Street SW. • Widen 200th Street SW to accommodate the additional traffic resulting from the construction of the Lynnwood Link Extension and additional parking garages, in addition to the transit center. • Designate 46th Avenue W, south of 200th Street SW, HOV only. • Open 202nd Street SW between 44th Avenue W and 46th Avenue W to create a secondary access point to the facilities at Lynnwood Transit Center. • Retain or relocate Community Transit's Ride Store in close proximity to the transit center.
L-012-018	<p>Alternative C-2: Community Transit could also support this alternative, with modifications. This location would still provide for a convenient transfer point between Link light rail and the fixed-route transit center. TOD opportunities are still available. However, the pedestrian connectivity is not as good as that provided the 200th Street SW location for pedestrians destined for businesses along the 196th Street Corridor and within City Center.</p> <p>The modifications requested for consideration are:</p> <ul style="list-style-type: none"> • Retain Community Transit's Ride Store at its current location, in close proximity to the transit center. • Provide covered pedestrian bridges between the Link station, transit center, and parking garage. • Designate 46th Avenue W, south of 200th Street SW, HOV only. • Open 202nd Street SW between 44th Avenue W and 46th Avenue W to create a secondary access point to the facilities at Lynnwood Transit Center.
L-012-019	<p>Alternative C-3 Option1: Community Transit does not support this alternative because of the significant separation between the proposed Link station and fixed-route bus service. It has the least amount of potential to spur future TOD development that will increase the transit market and it has the worst pedestrian connections between the Link station, transit Center, parking garage and commercial developments along the 196th Street Corridor and City Center of all the alternatives.</p>
L-012-020	<p>Alternative C-3 Option 2: Community Transit has concerns with this alternative. Although it improves the transfer point between Link light rail and fixed-bus transit service, the remaining issues identified with Alternative C-3 Option 1 remain. Additionally, the relocated transit center would increase travel running times for buses serving the facility and increase operating costs.</p>
L-012-021	<p><u>Construction Impacts:</u> Mitigation required for Community Transit to maintain existing inter-county transit service for the construction of the Lynnwood Link Extension includes, but is not limited to, financial assistance for operating and capital expenses to increase service. The rest of the construction impacts are directly related to the station location for Lynnwood Transit Center.</p>
L-012-022	<p>Alternative C-1, with the modifications suggested by Community Transit, would require a temporary transit center while the facility is being constructed. This could occur in the existing park and ride facility. It would further reduce the number of parking stalls available. TDM measures and increase in local feeder service could mitigate these additional impacts.</p>

Community Transit – Lynnwood Link DEIS Attachments
September 23, 2013

3

L-012-018

Thank you for your comment stating support for Alternative C2 and providing reasons and proposed modifications for this alternative.

L-012-019

Community Transit's concerns with Alternative C3 Option 1 are noted. Please see response to comment L-012-005.

L-012-020

Community Transit's concerns with Alternative C3 Option 2 are noted; the range of alternatives in Lynnwood was developed to explore the differences that variations in sites and layouts might offer in terms of transportation performance, costs, and environmental impacts. The distance between the existing transit center and the new site is relatively small.

L-012-021

As described in Section 3.6.9 of the Final EIS, any plans involving transit service modifications would be coordinated with King County Metro, Community Transit, and private transit service providers to minimize construction impacts and disruptions to bus facilities and service.

Please see response to comment L-012-002 for a discussion of construction impacts and mitigation.

L-012-022

Sound Transit appreciates the suggestions for Alternative C1, but the transit center would not need to be closed during construction. The other detailed suggestions for facilities and amenities involve design definitions that would be determined at later stages of the project, and Sound Transit would involve Community Transit and others to participate in the development of such designs regardless of the alternative

L-012-023	Alternative C-2, with the modifications suggested by Community Transit, does not appear to impact transit operations in the area. However, if TDM were used to mitigate the reduction in parking available, funding would be needed to increase service.
L-012-024	Alternative C-3, Options 1 and 2, do not appear to impact Community Transit operations in and out of the Lynnwood Transit Center. As stated above, funding would be needed to provide additional local feeder service, as a mitigation measure for the loss of 560 parking stalls.
Additional Comments and Mitigation Suggestions In addition to the specific comments provided above, Community Transit is providing the following general comments for future design consideration and additional mitigation measures.	
L-012-025	<ul style="list-style-type: none"> Where elevated tracks are constructed over local roads, a minimum height clearance of sixteen feet would be required to accommodate the Double Tall buses. This would allow maximum flexibility for Community Transit when developing future service in south Snohomish County.
L-012-026	<ul style="list-style-type: none"> There are additional highway projects that would significantly enhance the transportation system, during and after the completion of the Link light rail extension to Lynnwood: <ul style="list-style-type: none"> ➤ Direct access between the NB I-5 HOV lanes and SB Interstate 405 (I-405) HOV lanes ➤ Direct access between NB I-405 HOV lanes and the SB I-5 HOV lanes ➤ Direct access between SB State Route (SR) 525 and the SB I-5 HOV lanes ➤ Direct access between the NB I-5 HOV lanes and NB SR 525 <p>By providing direct access points between the HOV lanes of different freeway systems, the potential for accidents would be reduced and traffic flow improved by eliminating the need for HOVs to cross into general purpose lanes to access the connecting route. These improved connections would also reduce travel times and the cost to provide bus service. The SR-525 to I-5 SB connection would enable Community Transit to remain on the freeway system, thus providing improved service between Mukilteo and destinations in King County.</p>
L-012-027	<ul style="list-style-type: none"> Sound Transit is encouraged to work with the Washington State Department of Transportation (WSDOT) to adjust the carpool policy from 2+ to 3+ as a construction mitigation measure.

selected. It is correct that any of the alternatives involving construction on existing park-and-ride facilities would reduce the available parking supply, and that transit and TDM measures could help address the impact.

Please see response to comment L-012-002 for a discussion of construction impacts and mitigation.

L-012-023

Sound Transit appreciates the suggestions for Alternative C2. As described in the previous response (L-012-022), such details will be determined later in the project by Sound Transit in collaboration with Community Transit and others.

L-012-024

The Final EIS Chapter 3, Section 3.6.9., includes further discussion of mitigation options for the loss of parking stalls during construction. Improvements in transit service are among the options identified.

L-012-025

Sound Transit's existing design standard for placing guideways over any roadway is a minimum 16.5-foot vertical clearance.

L-012-026

Sound Transit agrees that there are a number of other projects, including HOV direct access improvements, that could complement the Lynnwood Link Extension and address other transportation needs and problems. However, they are beyond the scope of the project being studied in the EIS.

L-012-027

Changes to the carpool policy from 2+ to 3+ will be discussed with

**Community Transit Comment Detail:
Lynnwood Link Extension Transportation Technical Report**

- L-012-028** 1. Pages 4-25 through 4-36, Section 4.2.2 (Regional Transit): it is not clear if LOS analysis is for Sound Transit only or includes all agencies. The information provided for transit frequency, hours of service, and passenger load read as if the analysis includes Community Transit, King County Metro, and Sound Transit; whereas, the data for reliability and on-time Performance only includes Sound Transit data.
- L-012-029** 2. Page 5-31, Local and Sub-Regional Bus Transit: thank you for including the last sentence for the NE 185th Street Station regarding transit priority treatments along NE 185th Street for *Swift* BRT service to the station.
3. Page 5-33: Community Transit concurs with the continued use of the Mountlake Terrace Freeway flyer station for Alternative B-1, B-2, and B-2A, as a connection point between bus transit and Link light rail service.
- L-012-030** 4. Page 6-1, Construction Impacts: the third bullet states the at-grade rail alignments and bridge reconstruction proposed with Alternatives A1, A5, and A10 could require lane closures on I-5, one in each direction, for up to one month.
- Any lane closures that increase traffic volumes on I-5 have a negative impact on transit operations, and must be mitigated. The existing transit riders making use of current inter-county bus service are future Lynnwood Link customers. This existing market needs to be protected during the construction of Link. It is also likely that demand for transit service will increase as I-5 conditions deteriorate in the general purpose lanes.
- To minimize these impacts, I-5 lane closures should be limited to late night and weekends, the HOV lanes should be increased from 2+ to 3+ passengers per vehicle to maintain speed and reliability for the existing inter-county bus service.
5. Page 6-1, Construction Impacts: the fourth bullet states elevated alignments will require night time closures. This should not impact Community Transit operations, but could impact Sound Transit's 500 series Express bus service between Snohomish and King Counties.
6. Page 6-1: the sixth bullet states Alternatives B1 and B2/A require construction in the median on I-5, adjacent to the transit center: construction activity will require the direct access ramps and freeway flyer station to close for 1 to 2 months.
- Sound Transit needs to work with WSDOT to find an alternative to closing the Mountlake Freeway Station: any closure of this facility will have significant negative impacts on Community Transit Commuter and Sound Transit Express Bus service. The most significant impact is, but not limited to, major reroutes for the existing eight commuter/express buses that stop at this facility. These reroutes will impact travel time, which will add to the operating and, possibly, capital costs to provide this service between Snohomish and King Counties during the construction phase of the Lynnwood Link Extension.
7. Page 6-1: the last bullet states construction of the light rail station will reduce the number of park & ride stalls. Mitigation could include TDM measures to encourage drivers to use local

5

Community Transit – Lynnwood Link DEIS Attachments
September 23, 2013

WSDOT as the mitigation program continues to be developed and refined during final design. This measure could also be an element of the construction traffic management strategy for I-5 lane closures.

L-012-028

Section 3.2.2 of the Final EIS has been updated to clarify that the LOS analysis for transit frequency and hours of service included Sound Transit, King County Metro and Community Transit services, and that the reliability and on-time performance data are primarily from Sound Transit.

L-012-029

Thank you for your comment.

L-012-030

Please see response to comment L-012-002 for a discussion of construction impacts and mitigation.

transit options to access the Lynnwood Transit Center during construction; however, no specifics are provided for the TDM strategies. One suggestion is partnering with Community Transit to increase the coverage of the Curb the Congestion program. Additionally, if Community Transit is the provider of the "local transit option," financial assistance will be needed for operating and capital costs to provide such service.

8. Page 6-10, Segment A, General Purpose Traffic Impacts: confirms impacts to transit with I-5 lane closures for between 1 – 2 months as a result of bridge replacements. Same concern as stated above for item #4. Community Transit would prefer construction requiring I-5 lane closures to occur during late night hours and/or on weekends. If this is not possible, the same mitigation measures should be considered.
9. Page 6-10, Transit Impacts: there will also be negative impacts to Sound Transit Express Bus Route 512, which needs to cross from the left HOV lanes and to the NE 145th St. Freeway Flyer stop: if one-lane general purpose I-5 lane is closed in each direction, this movement will be more difficult affecting service speed and reliability.
10. Page 6-13, Transit Impacts: the narrative should include negative impacts to Community Transit's 400 and 800 series commute service and Sound Transit's 500 series Express Bus service, if the I-5 lane closures are on a 24-hour basis, as opposed to the late night closures. See comments for #4 and #9.
11. Page 6-14, Transit Impacts: see response for comment #10.
12. Page 6-15, General Purpose Traffic Impacts: if possible, Community Transit would prefer the late night and weekend I-5 lane closures as opposed to 24-hour lane closures. Otherwise comment #4 applies.
13. Page 6-15, Transit Impacts: should repeat the General Purpose Traffic Impacts relating to the I-5 closures. See response for comment #4. Again, Community Transit would prefer night time closures that do not disrupt I-5 during weekday AM and PM peak period commutes.
14. Page 6-22, Segment B, Transit Impacts (top of page): see comment #4 regarding I-5 lane closures. Additionally, see comment # 6 relating to the Mountlake Terrace Freeway Station.
15. Page 6-22, Alternative B-1, Transit Impacts (bottom of page): same comment as above #6.

Reroutes for buses coming from the north to MLT and heading north after stopping at MLT from/to I-5 will have to exit/enter I-5 at 220th Street SW because there are no direct I-5 on or off-ramps on the north side of 236th St SW to the Mountlake Terrace Park and Ride. This will not only inconvenience riders, but increase the cost to provide the service for both Community Transit and Sound Transit. Both agencies may also have to work with the City of Mountlake Terrace to find an alternative bus stop to reduce the total time delay with the inability to use the freeway station.

Additionally, the second paragraph states bus circulation may be constrained, but not restricting during Alternative B1 construction. Again, any change to stops, reroutes, or other operational changes will have negative impacts to current transit riders, by moving bus

L-012-030

stops, increase in travel time, possible decreases in reliability, and most likely increased costs to provide comparable service.

16. Page 6-23, Alternative B2, Transit Impacts: same comments as #6 relating to the Freeway Station. Additionally, the 1 month closure of 228th St SW will impact at least two Community Transit local bus routes that cross I-5 via the 228th/230th Street SW bridge. This will require significant reroutes because there are limited alternatives for crossing over I-5. Community Transit requests mitigation for this impact.
17. Page 6-24, Alternative B2A: Impacts to transit should be further described beyond, "during construction, transit would experience some delay and bus stops could be temporarily relocated."
18. Page 6-24, Alt 4, Transit Impacts: see comment #6.
19. Pages 6-25 and 6-26, Alt. C-1, Transit Impacts: increase in traffic congestion along 200th Street SW will negatively impact transit operations in and round the Lynnwood Transit Center: increase in delay, decrease in reliability, etc. Community Transit requests mitigation needed to compensate for these impacts to local service, which is also recommended as a mitigation measure for the loss of parking stalls at Lynnwood Transit Center during construction. Mitigation for the loss of parking stalls could also include coordination with Community Transit to enhance the existing Curb the Congestion TDM program.
20. Page 6-27, Alt C-3, Transit Impacts: thank you for minimizing transit impacts by limiting the 46th Avenue W I-5 direct access ramp closures to late nights and weekend. Sound Transit routes will be still be impacted by weekend closures.
21. Page 9-10 Construction Mitigation, Transit: Community Transit requests financial mitigation to provide additional in service, needed to off-set impacts resulting from the construction of the Lynnwood Link Extension to the Lynnwood Transit Center.
22. Page 9-10 Construction Mitigation, Transit: there is no mention of mitigation for the negative impacts to transit resulting from I-5 lane closures. This impacts all agencies currently providing service on I-5 corridor within the project area.

L-012-031

23. Page 9-11, 4th bullet: all communications regarding parking and transit service should be coordinated with Community Transit and King County Metro.

L-012-031

As described in Section 3.6.9 of the Final EIS, transit service modifications would be coordinated with King County Metro, Community Transit, and private transit service providers to minimize construction impacts and disruptions to bus facilities and service.

Swift, Lauren

From: Roland Behee <Roland.Behee@commtrans.org>
Sent: Tuesday, September 24, 2013 4:52 PM
To: Lynnwood Link DEIS
Cc: Carol Thompson; June DeVoll; Kate Tourtellot; Wade Mahala; Joy Munkers
Subject: Community Transit - Station ADA Service Accessibility

L-013-001 Community Transit submitted a letter and supporting technical comments on the Lynnwood Link DEIS on 9/23. We would also like to offer additional input reinforcing comments provided by King County Metro in their comment letter regarding ADA paratransit service and accessibility of the Link system.

Link station design should maximize accessibility for all patrons such that Link serves as a viable alternative to expensive ADA paratransit service for the largest possible riding population.

It is also important that Link station design carefully consider proximity and connectivity between rail platforms and parking spaces for ADA paratransit vehicles for passengers that will transfer between light rail and ADA service.

Thank you for considering these additional comments.

Roland Behee
Strategic Planning Unit Manager
Community Transit
(425) 348-2368

L-013-001

ADA and paratransit accessibility are part of Sound Transit's commitments for the project, and details will continue to be addressed during further design. The project design will meet or exceed all applicable ADA requirements.



King County

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September 20, 2013

Lauren Swift
Sound Transit Lynnwood Link Draft Environmental Impact Statement
401 S. Jackson Street
Seattle, WA 98104

Dear Ms. Swift:

L-014-001 The King County Department of Transportation (KCDOT) is pleased to submit comments on the Lynnwood Link Draft Environmental Impact Statement (DEIS). King County is a partner with Sound Transit in its mission to expand high capacity transportation across the region and attract more transit ridership. Providing reliable, frequent, rapid, and efficient all-day two-way transit service is an objective we share for the Lynnwood Link extension project.

Since Lynnwood Link light rail extension will affect King County Metro Transit's fixed bus routes, van pools and paratransit services, we have actively participated in this project since its inception and have served as a cooperating agency since September of 2011. King County has provided scoping comments as well as comments on transportation-related discipline reports and the preliminary DEIS. We appreciate that many of our previous comments have been addressed in this document and that our suggestions have helped shape the analysis.

The following comments are offered to support this project by improving the utility of the EIS as a decision-making tool. They focus primarily on segment A of the study area which roughly corresponds to Metro's service area, though our comments also address features of the project located in segments B and C. The following comments are listed under the appropriate section headings. In addition, we have attached technical comments to address more detailed concerns and suggestions.

COMMENT SUMMARY

To improve the value of the FEIS as a decision-making tool, we offer some additional considerations to address in the analysis such as alternatives which place greater emphasis on connecting transit service and non-motorized travel options as a means to access stations, as well as consideration of transit oriented development rather than park-and-ride garages. There should also be acknowledgement of the potential for future tolling and other transportation demand management strategies in the study corridor.

L-014-001

Thank you for your comments and efforts in working on the initial development of the Lynnwood Link Extension, and for the County's continued support for the project.

Lauren Swift
September 20, 2013
Page 2

L-014-002 Regarding the preferred alternative, King County does not have a position on an elevated or at grade profile. King County does support alternatives A10 or A11. Locating a station at NE 130th Street would capitalize on this location's strong transit ridership projections, more efficient local bus connections and superior non-motorized access. King County also prefers a non-freeway median station location at Mountlake Terrace along with suggested design modifications to improve accessibility at the 220th Street SW and Lynnwood stations.

L-014-003 PURPOSE AND NEED

The project's Purpose and Need appears to have been revised to be more comprehensive subsequent to previous versions of the document. We suggest addressing frequency in the first bullet on page 1-4, as well as the need for more reliable reverse peak direction transit since reverse peak travel is one of the problems specifically addressed in the transportation analysis. Such a bullet could read:

Provide reliable, frequent, rapid, and efficient all-day two-way transit service of sufficient capacity to meet the existing and projected demand for travel to and from the corridor communities and other urban centers in the Central Puget Sound area.

ALTERNATIVES CONSIDERED

L-014-004 Link Station Access:

The analysis should consider a broader set of alternatives with regard to station access. Nearly every alternative and option analyzed by the DEIS proposes a similarly-sized parking garage at most stations. The resulting analysis reduces the utility of the EIS as a decision-making tool, because alternative approaches to station access and their impacts are not measured. The FEIS should evaluate alternatives to large stand-alone park-and-ride garages including increased connecting bus service, enhanced bicycle and pedestrian facilities to improve the transfer experience and transit oriented development. The FEIS needs to measure the impacts of both providing commuter parking and of not providing commuter parking or at least reduced commuter parking.

A string of park-and-ride garages as addressed in the action alternatives would result in a largely automobile-dependent light rail corridor. As shown in the DEIS, these garages would exacerbate local traffic congestion and related impacts, including delays to local and connecting bus service. By contrast, comparably scaled investments in non-motorized access and transit connections would be more consistent with the project's vision, especially as expressed by the last two bullets under 1.2.2 *Need for the Project* on page 1-5. Consideration of this alternative approach to station access in the FEIS would result in a more informative and useful analysis by addressing how ridership and travel time would be affected if comparable investments were made in connecting bus service and non-motorized access to Link stations or additional Link stations (e.g., NE 130th Street and 220th Street SW in Mountlake Terrace).

Including alternatives to park-and-rides in the EIS would also be consistent with Sound Transit's 2012 Transit Oriented Development (TOD) policies. One important goal of the policy is to

L-014-002

The County's comments on Alternatives A10 and A11, which indicate a preference for the NE 130th Street Station, are noted. Sound Transit has continued to explore design modifications for the 220 Street SW and Lynnwood stations, with improved multimodal access being key considerations. The County's preference for a non-freeway station at Mountlake Terrace and suggested design modifications at 220th Street SW and Lynnwood stations are also noted.

L-014-003

The purpose and need statement in Section 1.2 of the Draft EIS was slightly modified based on public comments received during public scoping. FTA and Sound Transit made minor clarifying edits to help simplify the discussion. High frequency service was part of the definition of all alternatives under consideration.

L-014-004

Park-and-ride lots are one of many strategies to maximize transit accessibility, and the Final EIS explores additional parking options at several stations. However, the project already assumes that in many stations, the majority of patrons would be arriving by other modes, particularly transit. The Preferred Alternative also includes improvements in bicycle and pedestrian facilities in station areas and on the streets that would be modified by the project. Sound Transit will continue to explore other modal improvement options as the project advances, in coordination with its partner agencies.

The parking supply described for the alternatives was intended to define the likely upper range of parking that would be provided, which in turn helped estimate the upper range of related impacts such as parking (including potential "hide-and-ride" parking activity), noise, visual impacts, and property requirements. Other details such as the type and

Lauren Swift
September 20, 2013
Page 3

L-014-004 "Encourage convenient, safe multi-modal access to the transit system, with an emphasis on non-motorized access." A focus on TOD rather than park-and-ride garages could provide more all-day ridership, an important question for the EIS to address.

The DEIS analysis predicts an increase of approximately 23,000 riders. The assumptions for this increase must include a significant proportion of transfers from connecting bus service or non-motorized access because the park-and-ride garages will provide access for only a small portion of that increase. The FEIS should provide detail about how that connecting bus service would be supported by Sound Transit's facilities, or provided by Metro and Community Transit.

Regarding pedestrian and bicycle access, the description of the alternatives should address how future light rail passengers will safely and conveniently access the stations on foot or by bicycle. Where will paths or ramps connect to adjacent streets? What kind of bike parking will be provided? How many bike lockers will be provided?

L-014-005 Support for NE 130th and NE 145th Street Stations:

King County recommends that the Lead Agency include a station at NE 130th Street in the Preferred Alternative as depicted in Alternative A10 or A11 in addition to the station at 145th. A NE 130th Street station would be approximately mid-way between the Bitter Lake and Lake City Urban Villages in the City of Seattle. A station at NE 130th street would have the advantage of less east-west traffic congestion facilitating reliable local and connecting bus service along with significantly more on and off-street parking capacity as well as fewer accidents.

King County supports a station at NE 145th Street. However, issues with congestion, transit access, and parking will require roadway and pedestrian improvements to the NE 145th street corridor. King County believes that the assumption that there should be 500 car garages at both NE 145th and NE 185th should be carefully analyzed to determine whether it might be better to provide more parking at 185th than congested 145th. King County does not support parking at a NE 130th Station.

L-014-006 Mountlake Terrace Station:

King County supports locating a light rail station elsewhere than the I-5 median in order to allow continued transit use of the existing freeway stop by Sound Transit and Community Transit during light rail construction. A non-freeway median station location closer to the Mountlake Terrace town center would also increase light rail ridership in the long run by reducing walking distance and by increasing opportunities for TOD. As documented in greater detail in our attached paratransit comments, riders with impaired mobility would especially benefit from improved proximity, while reducing reliance on costly Access paratransit service.

ADA Accessibility:

L-014-007 Many paratransit trips begin in Snohomish County and end in King County. Therefore, accessibility issues at stations outside Metro's service area can still impact the cost to provide Access paratransit service. This means that facilities not only in King County need to be accessible, but that the whole system is accessible. Building new public transportation infrastructure provides an opportunity to make the system as accessible as possible, while

amount of bicycle parking, and more detailed station access planning will be developed during further design of the stations.

L-014-005

Sound Transit acknowledges the County's preference for a station at NE 130th Street. The Preferred Alternative includes an at-grade and elevated alignment with stations at NE 145th and NE 185th Streets (Alternative A1 with modifications). The Draft EIS also evaluates options for a potential station at NE 130th Street.

L-014-006

The County's preference for the Mountlake Terrace Transit Center station is noted.

L-014-007

All Sound Transit facilities and projects will be designed to meet ADA requirements. Sound Transit will continue to work with King County and its other partner agencies to develop detailed station access plans as the project advances, and this will provide the opportunity to integrate King County's suggestions and further involve you in station design decisions.

To address the larger questions regarding paratransit service at a system level, as well as other transit system integration matters, Sound Transit and King County are now collaborating on the Metro Long Range Plan and Sound Transit's Long Range Plan Update and ST3 planning.

L-014-007 employing more costly mitigation measures like paratransit to address the remaining gaps. In order to insure that the system is as accessible and as useful to as many customers as cost-effectively as possible, three key elements should be evaluated:

1. Accessibility of the service;
2. Accessibility of the connections; and
3. Accessibility to destinations served.

We have attached more detailed recommendations for ensuring system-wide accessibility including specific design suggestions for each station alternative to increase the independence of people with disabilities while also reducing the cost of providing paratransit services.

L-014-008 **Transportation Demand Management and Tolling:**

In the evaluation of long-term or cumulative impacts, the FEIS needs to provide a more accurate analysis of likely future conditions consistent with TDM and tolling for the I-5 corridor planned by PSRC and under consideration by WSDOT. PSRC'S adopted *Transportation 2040* plan includes a number of provisions to reduce future traffic congestion on key corridors in the study area and WSDOT is currently in the process of evaluating variable tolling of I-5. As these strategies will reduce traffic congestion and increase transit demand, they will directly affect the performance of all modes using the I-5 corridor, affecting the performance of each alternative and therefore need to be evaluated accordingly.

TRANSPORTATION IMPACTS AND MITIGATION

L-014-009 **Addressing impacts on people with disabilities now and in the future:**

The DEIS evaluates the impact of the project on culturally and linguistically diverse populations and low income populations but does not evaluate the impact on people with disabilities. The FEIS needs to evaluate the project's impact on people with disabilities in order to identify additional aspects of the project that could be altered to increase the benefit of the project to this population.

In addition, the DEIS does not consider the implications of upcoming demographic changes. As the population ages, the transportation needs and abilities of system users will also change. This change increases the need to ensure the new line is built to accommodate the widest variety of abilities and disabilities.

Construction Impacts

L-014-010 The Construction Impacts section (Section 3.3) needs to clarify how construction will impact local bus service and access to bus stops.

L-014-011 KCDOT and Metro will continue to be active partners in the Lynnwood Link project as it moves forward, participating in the SeaShore Transportation Forum and working directly with Sound Transit to optimize integration of our respective transit systems to improve regional mobility and accessibility for all.

L-014-008

The modeling assumptions used for the project were developed in consultation with WSDOT and other cooperating agencies as part of the initial methodology development and scoping phase of the Draft EIS, and the parties agreed that managed and tolled lanes on I-5 should not be assumed for several reasons.

First, the travel demand modeling performed for the Lynnwood Link Extension Final EIS is consistent with the fiscally constrained project list contained in PSRC's Transportation 2040 plan.

Second, there has been very limited development of concepts for I-5 tolling, and the lack of detailed data on the impacts of tolling on the I-5 corridor would make the analysis of impacts related to the light rail project very difficult to accurately assess. (By contrast, at a system level, a limited number of tolled facilities have been assumed outside of the corridor, including I-405 between downtown Bellevue and Lynnwood, SR 520 between I-5 and I-405, I-90 between I-5 and I-405, and the SR 99 tunnel in downtown Seattle, all of which have been or are being examined in other project-level analyses).

Third, future travel conditions without the unfunded managed toll-lane facilities would be a worst-case scenario because the traffic congestion would be worse and transit ridership likely lower than with managed and/or toll facilities. (Sound Transit's Long-Range Plan update and EIS, which is a plan-level document, does assume the regional tolling included in the current PSRC plan, but again its impact analysis and the PSRC plan's information is not location specific.) Appendix A in the Transportation Technical Report provides detailed information about the methodology for the travel demand forecasting analysis.

L-014-009

Sound Transit would not be permanently removing facilities serving

Lauren Swift
September 20, 2013
Page 5

L-014-011 We hope these comments prove helpful as the FEIS is developed. We have attached additional suggestions regarding specific detail on integration of paratransit into station alternatives. We look forward to continuing to work with Sound Transit to refine the project's design and improve its utility for optimizing regional mobility, especially the speed and reliability of public transportation.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

Attachments

cc: Laurie Brown, Deputy Director, KCDOT
Kevin Desmond, General Manager, Metro Transit Division, KCDOT
Chris Arkills, Transportation Policy Advisor, King County Executive Office

people with disabilities, and the project will be built to meet ADA requirements, with operational and functional improvements in transit service as well as other local transportation facilities. Therefore, no adverse impacts to persons with disabilities has been identified. In many locations, non-ADA compliant facilities such as sidewalks and intersections would be improved, and the project would offer mobility benefits to disabled individuals as well as the general population. The EIS is intended to identify adverse impacts. Sound Transit recognizes that demographic trends indicate a continued increase in the percentage of the overall population that will be senior citizens who may have disabilities; this project would provide an alternative to driving, which would be a benefit.

L-014-010

Sound Transit recognizes the need to support and maintain transit markets during construction. The Draft EIS and the Final EIS both described mitigation measures including TDM/transit elements, with additional operational details to be prepared during final design to minimize impacts related to temporary closures. The Final EIS also provides more definition of the location and duration of closures and their related impacts, as well as minimization measures such as timing closures to be in off-peak periods, evenings, or weekends where possible.

L-014-011

Thank you for your comments and efforts in working on the initial development of the Lynnwood Link Extension.

**Lynnwood Link Extension Draft EIS
Paratransit Comments**

L-014-012 Background

Access paratransit service is provided to people when they are prevented from riding regular Metro and Sound Transit services by their disability. The service is required by the Americans with Disabilities Act of 1990 (ADA) within three quarters of a mile of all regular (non-commuter) bus services. In Snohomish County, Community Transit's paratransit service is called DART. Sound Transit also has ADA paratransit obligations along Link Light Rail lines. Sound Transit currently contracts with Metro to share the costs of Access service for trips originating and terminating in locations along light rail lines.

The Lynnwood Transit Center is a major paratransit transfer location. Customers traveling between King County and Snohomish County must transfer between Access and DART at this location. If adequate space is not provided at Lynnwood Station, another location would be needed. Any alternate location would need to have good access to I-5 in order to avoid significant impacts on Access's and DART's operational efficiency.

In addition to paratransit services, the ADA encourages transit agencies to enable as many people with disabilities to use their regular transit services as possible. Because of this and the expense of providing paratransit service, Metro works to find ways to move Access riders onto regular transit services. The main strategy used is Conditional Eligibility.

Currently 33 percent of Access customers are conditionally eligible for Access, meaning that they are able to use regular transit services under some conditions. These conditions relate to barriers that prevent them from traveling and can include things like the need for curb cuts and level sidewalks. Access reviews the trips made by conditionally eligible customers to determine whether there is an accessible pathway available on regular transit services. If a pathway is available, then the customer can no longer use Access for that trip.

The current trip review process requires that a trip be completely accessible to a customer from the origin to the destination. One barrier on a single section of a trip results in a customer receiving the entire trip on Access.

Feeder Service

Under ADA legislation, Access can provide conditionally eligible customers with a ride to a bus stop or train station and then expect customers to complete the rest of their journey on the bus or train.

Sound Transit's Link Light Rail service has reliability and frequency necessary for providing feeder service. As the Sound Transit light rail network continues to expand, a feeder service program will be able to generate significant operational efficiencies. For example, customers traveling to Seattle from Snohomish County could be transported to the Lynnwood Station by DART and then use the light rail to get to the station closest to their destination. If needed, customers could either use bus services or Access for the final segment of their trip.

L-014-012

Sound Transit will design the project to meet ADA requirements, consistent with other federal Sound Transit projects in place or under design now. The station planning programs and Sound Transit design standards incorporate this commitment for effective ADA service, including connections between providers. Further details for each station will be developed during final design in coordination with ADA service providers. More detailed service planning and any service agreements will also be conducted in the later stages of project development as the system approaches operation. However, space for paratransit is generally included in the conceptual plans for the station areas assessed in the EIS. Sound Transit also considered these comments as it updated specific station designs as part of preliminary engineering for the Preferred Alternative, but the level of design used for the EIS remains conceptual to preliminary, and many of the comments involve final design decisions and operational planning, which occur later in the project.

Sound Transit also appreciates the comments regarding persons with disabilities as well as future demographic changes affecting mobility for the general population. Several areas of the EIS address factors that will be important to providing effective ADA access, including the transportation analysis of various modal connections, as well as Section 4.4 Social Impacts, Community Facilities, and Neighborhoods, and Appendix C Environmental Justice Analysis, which incorporate transit-dependent population information from the U.S. Census. More detailed analyses for the purposes of the EIS are not necessary, however, because the project is not removing transit connections without providing improvements in services and facilities that would benefit the general population as well as persons with disabilities. No adverse impacts to persons with disabilities have been identified. However, as Sound Transit initiates final design and conducts more detailed service planning in collaboration with Metro, there will be further

L-014-012

Locating both a feeder site and the transfer site at the Lynnwood Station could further increase operational efficiencies.

Accessible Transit Systems First

When it comes to accessibility, the focus is often on the required paratransit services and then on what changes can be made to improve accessibility to reduce the costs of paratransit. Building new public transportation infrastructure provides an opportunity to focus on making the system as accessible as possible first and then looking at mitigation measures like paratransit for the remaining gaps. In order to insure that the system is as accessible as possible there are three key elements that should be evaluated:

- Accessibility of the service – what can be done to insure that the new rail line is accessible? This includes elements like level boarding, stations layouts that are easy to understand and reliable facilities like elevators and toilets
- Accessibility of the connecting services – what can be done to insure that it is possible to get to and from connecting services at stations? This includes easy access to and between bus zones and paratransit zones as well as adequate facilities at the zones.
- Accessibility to destinations served – what can be done to insure that destinations served by the station are easy to get to? This is particularly important at locations that have or are expected to have transit oriented development. It includes minimizing the distance required to travel to access nearby destinations from the station and making that travel easy and pleasant.

Considering all three elements can help maximize the number of people able to use the new service. This increases the independence of people with disabilities and reduces the need for customers to ever utilize paratransit services, reducing the cost of such services.

Paratransit trips can begin in Snohomish County and end in King County. Accessibility issues at stations outside Metro's service area can still impact the cost of Access paratransit service. This means that it is important that not only facilities in King County be accessible, but that the whole system be accessible.

Please consider the following comments.

Overall:

1. The Lynnwood Link Extension Draft Environmental Impact Statement evaluates the impact of the project on culturally and linguistically diverse populations and low income populations but does not evaluate the impact on people with disabilities. An evaluation of the impact on people with disabilities could identify additional aspects of the project that could be altered to increase the benefit of the project to people with disabilities.
2. Additionally the DEIS does not consider the implications of upcoming demographic changes. As the population ages, the transportation needs and abilities of system users will also change. This change increases the need to insure that the new line is built to accommodate the widest variety of abilities and disabilities.

opportunities to discuss these issues; the Sound Transit System Planning program and the Metro Long Range Plan update also includes additional collaborative efforts to consider these suggestions.

Page	Comment
Appendix F, Sheets 65-71	<p>N 130th St Station Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate.</p> <p>Options 1 & 2 - The elevators to the platform should be in close proximity to the paratransit zones and bus zones. The paratransit zone is currently too far from the bus zones. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p>
Appendix F, Sheets 72-79	<p>N 145th St Station Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate.</p> <p>Option 1 & 2 - NB bus bay is far from station, making access difficult for some customers with disabilities. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>Option 2, Sheet 76 - If paratransit and SB bus zone could be co-located at the same location as the current paratransit zone it would improve access for customers with disabilities.</p>
Appendix F, Sheets 80-83	<p>N 155th St Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate. However, the current location of paratransit zone is not suitable. The paratransit zone should be located in close proximity to both bus zones and the elevators to the platform.</p> <p>This design provides very easy access for customers with disabilities from bus zones to elevators to platform. Having three elevators that provide access to the platform insures excellent access for customers with disabilities in the event one is not functioning.</p>
Appendix F, Sheets 84-94	<p>N 185th St Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate.</p> <p>Options 1 & 2 - The paratransit zone is well located. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>Option 3, Sheet 91 - This design appears to require customers to use an elevator when traveling between the paratransit bay and the bus bay in the transit roadway. This is</p>

	<p>not as easy to use as Options 1 and 2. Having two elevators that provide access to each platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>All Options (Sheets 84, 88 & 91) - It is unclear what the pathway is for passengers walking between station and EB bus zone on NE 185th. A N/S crosswalk needs to be provided near the intersection of NE 185th St and the reconstructed 5th Ave NE in order for the EB zone to be usable and safe. If the paratransit bay is moved to enable this crosswalk, it should still be located very close to its current position.</p>
Appendix F, Sheets 95-98	<p>Mountlake Terrace/236th St SW Transit Center Station</p> <p>Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. Metro considered this station as a potential transfer point between Community Transit's DART service and Metro's Access service. However, this location lacks a southbound off ramp and a northbound on ramp to I-5. In addition, the site is space constrained, making it difficult to find enough space for the number of required paratransit zones. For this reason the one paratransit bay provided is adequate for Metro's needs. Sound Transit should also consult with Community Transit in regards to their paratransit needs at this location.</p> <p>The distance between the paratransit zone and the EB bus zone on 236th St SW is further than optimal.</p> <p>Having two elevators that provide access to each platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p>
Appendix F, Sheets 99-101	<p>Mountlake Terrace/236th St SW Freeway Station</p> <p>The station design lacks a paratransit zone. The distance between the bus zones and the station platform is extremely large. If the station were modified to include a paratransit zone, it would also likely be extremely far from the station platform. This distance is likely to be beyond the capabilities of some customers with disabilities and would may result in additional paratransit usage. The distance may also be large enough that feeder service would not be possible at this station. The additional paratransit operations costs would impact the cost of providing Access and DART and would likely be shared with Sound Transit.</p> <p>Metro Accessible Services recommends that this station option not be selected.</p>
Appendix F, Sheets 102-105	<p>Mountlake Terrace/220th St SW</p> <p>Access does not anticipate using the paratransit bay at this station as it is in Snohomish County. However, this station might be an adequate alternate location for transfers between Community Transit's DART service and Metro's Access service. Conducting transfers at this location would reduce the distance that Access vehicles were required to travel in to Snohomish County. Further discussion would be needed between Community Transit, Metro and Sound Transit about whether this location would be a suitable alternative to the Lynnwood Transit Center for paratransit transfers between Access and DART.</p> <p>The station design is unclear about how customers could get from the paratransit bay</p>

	<p>to the WB bus zone on 220th St SW other than via the station platform. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>Sound Transit should also consult with Community Transit in regards to their paratransit needs at this location.</p>
Appendix F, Sheets 106-121	<p>Lynnwood Station <i>General Comments</i></p> <p>The Lynnwood Station is expected to be the most utilized station of the Lynnwood Link Light Rail Extension. This is because this station will be the main point of access to the planned Lynnwood downtown area and it will serve as a major interchange for bus services, with services from Everett expected to terminate here. In addition, the station will also have a large number of parking spaces for customers driving to the station. Each of these elements pulls the station design in a particular direction and balancing the needs of each type of access can be difficult.</p> <p>From an accessibility perspective, the two most important factors at this station are ease of access from the planned downtown and ease of transferring between the rail line and bus services. The 200th St SW option demonstrates prioritizing access to the planned downtown over ease of interchange. The Lynnwood Transit Center Option and the Lynnwood Park and Ride Option 2 both demonstrate the opposite. The Lynnwood Park and Ride Option 1 prioritizes access for car drivers over the other two objectives.</p> <p>In order to maximize accessibility at the Lynnwood Station, Metro Accessible Services requests that Sound Transit consider altering the 200th St SW Station to include a relocated transit center that is immediately adjacent to the station. This option could provide good access to both the planned downtown and to the connecting bus services. This would maximize the accessibility of the station and would help to increase the independence of people with disabilities while also reducing the cost of providing paratransit services.</p> <p>In addition to concerns about the accessibility of the station designs provided in the DEIS, Metro Accessible Services is also concerned about the number of paratransit bays provided in the Lynnwood Station drawings. The Lynnwood Transit Center is the current location of transfers between King County's Access service and Community Transit's DART service. Metro estimates that a total of four paratransit zones would be at this location.</p> <p>In addition, Metro is interested in pursuing feeder service to and from this station. Many paratransit customers may be able to complete much of their journey on light rail. A customer traveling from Snohomish county to a location in Seattle could be dropped off at the Lynnwood Station by DART and then picked up by Access at the Link station closest to their destination. This could result in a significant reduction in the cost of providing paratransit service. In order for this service to work, it is extremely important that paratransit bays be close to the the Link Station so that</p>

L-014-012

	<p>customers can easily get from DART to the light rail. Building a Lynnwood Station that has paratransit zones that can serve both as a feeder location and as a transfer location between paratransit services would allow for both Access and DART to maximize operational efficiencies.</p> <p>Paratransit shelter – Current transfer operations are conducted on a hand to hand basis. This means that no customers transferring between DART and Access are ever left alone. If the connecting vehicle is late, then the first vehicle must wait until it arrives to hand off the customer. This process adds an approximate 1,041 service hours annually to Access service, costing \$58,608. This policy likely adds a similar amount to DART's costs. Metro Accessible Services is interested in examining solutions to allow the transfer of customers between services without requiring vans to wait for the connecting vehicle.</p> <p>In order for paratransit vehicles to be able to drop customers off to wait for their connection, two issues would need to be resolved: protection from the elements and hand to hand service. Some paratransit customers are particularly vulnerable to the elements. In order to be able to drop off customers, a shelter with radiant heating and wind protection on four sides would be required. This shelter could also be incorporated into shopping/commercial facilities at the station, similar to those in the 200th St SW Option. The facilities would need to be close to the paratransit zone and would also be useful for feeder trips if they were located close to the station platform and the bus zones.</p> <p>The current system of providing hand to hand service was originally set up because some paratransit customers cannot be left alone. Currently 8% of the customers switching between Access and DART at the Lynnwood Transit Center require hand to hand service. Hand to hand service is not something that is required by the ADA, and it may be possible to identify partner agencies that could assist with these trips.</p> <p>In addition to the estimated savings from not providing hand to hand transfer service, Access estimates that the number of paratransit bays at the Lynnwood Station could be reduced to two bays from the four that would otherwise be required. [this is subject to further consultation with Community Transit]</p> <p><i>Lynnwood Station Option Specific Comments:</i></p> <p>200th St SW Option, sheets 106-109 - The distance between the paratransit zone, the bus zones and the station are significant and could impact the ability of customers with disabilities to transfer between services. The proposed design appears to prioritize the access of drivers using the parking garage over other modes of transportation.</p> <p>Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p>
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The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.

Lynnwood Transit Center Option, sheets 110-113 - The distance between the paratransit zone and the station and bus zones is adequate in this station design.

Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.

The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.

Lynnwood Park and Ride Option 1, sheets 114-117 - The bus zones are far removed from the station and paratransit zone, making it difficult for customers with disabilities to transfer between Link and local bus service. This could increase the need for customers to use paratransit, increasing the operations costs for Sound Transit, Community Transit and Metro. Requiring customers to cross both 46th Ave SW and the Kiss and Ride access road may also discourage customers from making the required interchange, particularly those with disabilities.

Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.

The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.

Lynnwood Park and Ride Option 2, sheets 118-121 - The paratransit zone is separated from the bus zones. Customers transferring from paratransit services to bus services would need to travel a significant distance, including taking an elevator to the platform, traveling to the other elevator and then taking that one to the bus bays. Paratransit to bus connections would therefore be reliant on both elevators being in working order. Additionally, the lack of a crosswalk between the station island and the paratransit bay/kiss and ride area means that if the elevator on the south end of the station is out of order, customers will be forced to cross the transit roadway in an area without a marked crosswalk.

The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.



September 25, 2013

Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Subject: Lynnwood Link Extension Draft Environmental Impact Statement

Dear Ms. Swift,

L-015-001

The Puget Sound Regional Council (PSRC) appreciates the opportunity to comment on the Lynnwood Link Extension Draft Environmental Impact Statement (DEIS) documents. Implementation of high-capacity transit to support growing communities is fundamental to the success of VISION 2040, the region's integrated long-range strategy for growth management, transportation and economic development. In addition, the *Growing Transit Communities Partnership*, housed at PSRC, focuses on developing equitable transit communities at station areas within this, and other, corridors. Accordingly, the PSRC has an on-going interest in transit system planning for the Northgate-Lynnwood corridor and has been designated as a Participating Agency in the project.

We commend Sound Transit for their work on the Lynnwood Link Extension Project to date and specifically the DEIS effort. The scope of the Lynnwood Link Extension DEIS spans the many growth management, transportation and economic development arenas for which the Puget Sound Regional Council oversees long-range regional planning. The DEIS has therefore been reviewed by transit planning, transportation modeling, and growth management department staff. That review found consistency with long-range planning documents and general agreement with the specific methodologies used to evaluate the impacts and benefits of different stations.

We do wish to make two primary recommendations moving forward with the final Environmental Impact Statement, on which we elaborate later in this letter:

- Develop a finer-grained measure to differentiate TOD potential between station locations and provide greater transparency on how qualitative rankings were assigned.
- Provide station access data by mode and clearly define how those different modes feed into the potential ridership calculation.

We commend Sound Transit on the effort made in the Lynnwood Link DEIS to examine and qualify the varying levels of TOD potential that different station areas and specific station locations offer. This new effort acknowledges the critical link between land use and transit investments to support the region's growth strategy and support transit ridership. In addition, it sets an important precedent for Sound Transit's future system planning efforts.

Comments on the Lynnwood Link Extension Draft Environmental Impact Statement | Puget Sound Regional Council | September 25, 2013

1

L-015-001

The Draft EIS and Final EIS summarize Sound Transit's assessment of transit-oriented development (TOD) potential in Table 4.2-3; this is based on the *Station Area Transit-Oriented Development Potential Report* conducted to support station area and project planning. The report was updated as part of the continued planning for the project during preliminary engineering and environmental analysis. A copy of the *Station Area Transit-Oriented Development Potential Report* is available through on the Sound Transit Website for the project at <http://www.soundtransit.org/Projects-and-Plans/Lynnwood-Link-Extension/Lynnwood-Link-Document-Archive>.

Based on comments from the Sound Transit Board and other parties, the level of information and the methods used were effective in highlighting the relative differences between station choices. The level of detail on TOD potential is consistent with Sound Transit practices for other recent Sound Transit EISs and appropriate at the EIS phase for comparing alternatives. The assessment is summarized to help determine the likelihood that the project could indirectly impact land use and other environmental conditions, as well as to consider whether it helped support land use plans and policies.

The Transportation Technical Report for the Final EIS has additional discussion of mode choice for accessing station areas, as well as more information on parking and other station access factors, including the relative accessibility of various station alternatives by all modes. The model results do not lend themselves directly to detailed analysis by mode, and instead are provided as an indication of likely ridership levels given surrounding land use, including future population and employment levels, existing transit use, and connecting transportation facilities. Further calculations of access by mode would be done during final design.

L-015-002

In the PSRC's comments on the North Corridor Transit Project Alternatives Analysis (2011), we requested that the DEIS consider the following three points that relate directly to ridership from station access and station area TOD:

- *"Ridership Potential:* The Alternatives Analysis Report provides overall ridership numbers for considered alternatives. PSRC suggests that the EIS segregate the potential ridership data by access mode (pedestrian, bicycle, transit transfer, car) for each station and include estimates on potential ridership that future transit-oriented growth could generate.
- *Transit Service Accessibility:* The Alternatives Analysis Report assigned the same rating of "moderate" to all three light rail alternatives for all modes of access (pedestrian, bus, bicycle, and park and ride). The EIS should provide a finer-grained measure, defined by a scale of five or ten rather than three, or use a more nuanced metric, in order to better differentiate between the alternatives.
- *Station Siting Considered in Draft EIS:* PSRC suggests that station siting effects on local planning efforts be carefully considered in the EIS. For example, proposed station areas should be located proximate to areas designated for high intensity transit-oriented development wherever possible. In addition, the siting of the northern terminus of the North Corridor Transit Project in Lynnwood should support various alignment alternatives of the high capacity transit corridor between Lynnwood and Everett that Sound Transit will consider in the future."

L-015-003

These requests were further supported by the final recommendations that emerged from the *Growing Transit Communities Partnership* in July 2013. One of the 24 Strategies recommended by the GTC Partnership was "Locate, Design and Provide Access to Transit Stations to Support TOD." The Strategy specifically calls for the following actions from transit agencies:

- Action 8.2: Strengthen criteria for selecting transit alignments and station locations to include TOD potential alongside other criteria such as environmental impacts, costs, and ridership potential. TOD potential should reflect both existing and planned uses and densities within transit station areas.
- Action 8.4: Design stations to provide multimodal access to transit, including on foot, bicycle, and via connections with other transit services.
- Action 8.5: Implement transit access and parking management strategies that support and encourage access via multiple modes of travel to the transit system, and that provide alternatives to automobile travel through approaches, such as: transit service connections to surrounding neighborhoods, bicycle and pedestrian connections, and demand management strategies (e.g., parking fees).

We commend Sound Transit for the *Station Area Transit-Oriented Development Potential Report* (April 2013) that the agency completed to support the Land Use portion of the Lynnwood Link Extension DEIS. The TOD Potential Report considered many of the issues raised in the PSRC comments and GTC Partnership recommendations noted above, including an examination and comparison of station areas based on criteria such as existing station conditions, station area character, station access, and potential development opportunities. We feel that these are critically important criteria inform station location decisions that best support existing communities and future residential and employment growth. Together with the recently board-adopted TOD Policy, this work sets an important new precedent for the agency to strengthen their consideration of TOD Potential in system planning and development.

We do however feel that the final EIS, as well as future system planning and development processes, should do more to make clear and explicit the consideration of TOD development potential and multi-modal access in the final EIS and future system planning and development processes. We make the following

Comments on the Lynnwood Link Extension Draft Environmental Impact Statement | Puget Sound Regional Council | September 25, 2013

2

L-015-002

Sound Transit considered the suggestions of the PSRC as it developed the methods for the EIS, and Sound Transit circulated methodology reports for the EIS to participating agencies for comment following the project NEPA/SEPA scoping period. It is important to note that the tiered approach to the Alternatives Analysis was by nature better suited to the use of evaluation criteria and ratings because it was conducted to help identify, refine, and narrow a wider range of modal and corridor options, including station sites.

For the EIS, the definitions of alternatives and their features were better established from the outset. Measures such as ridership potential and access could be more directly defined as part of the alternative designs and also considered through the application of Sound Transit's forecasting model. The alternatives under consideration were also similar in their locations and the markets served, and primarily involved siting and design choices, so qualitative measures did not tend to markedly differentiate the alternatives. Therefore, the use of detailed ratings in the Final EIS was limited; instead, the analysis focused on identifying areas of impact and describing mitigation where appropriate.

The discussion of Land Use in Section 4.2 included an assessment of consistency with planning policies (Appendix I-4.2), which noted areas where stations were located near where local plans or policies anticipated high capacity transit (HCT) or they at least contemplated increased densities; however, most jurisdictions make HCT-oriented designations after HCT projects are in the planning and design stages rather than before.

Finally, Section 2.5 described the key factors considered in developing alignment and station combinations; while land use conditions were an important factor, so were the placement of an alignment relative to

L-015-003

recommendations, consistent with our comments on the North Corridor Transit Project Alternatives Analysis and the recommendations of the Growing Transit Communities Partnership.

Develop a finer-grained measure to differentiate TOD potential between station locations and provide greater transparency on how qualitative rankings were assigned. While the qualitative scales of “limited-moderate-strong” TOD potential have the potential to be useful, they do not seem to always accurately reflect the station conditions described in the DEIS. In many cases, station locations that seem to perform differently on sub-measures were assigned the same value on the scale. In one example of this, the three station locations proposed for the Lynnwood Transit Center performed identically for existing conditions (limited-moderate). However, for the factors that comprised existing conditions, the 200th Street SW station clearly outperformed the other two station locations on two factors (population and employment, and existing station area character) and performed equally on the third factor (balance of mix of uses). Because the TOD Potential Report does not provide a definition for what specifically constitute a score of “limited” versus “moderate” versus “strong,” it is not possible to discern why these differing performances yielded the same designation. We recommend a more clearly defined and transparent methodology, as well as use of finer-grained measures that better differentiate between station locations. A forced ranking (e.g., 1st, 2nd, 3rd) of potential station locations for different measures would also provide a way to better compare relative performance.

Provide station access data by mode and clearly define how those different modes feed into the potential ridership calculation. The TOD Potential Report provides data on station access within the 15-minute walk and bicycle sheds. It is not clear how this information informs ridership projections. The detailed modal access data is not presented in the discussions of ridership in the main document of the DEIS. In order to be consistent with the intent of regional policy to promote multi-modal mobility and Sound Transit’s recently adopted Station Access policy that strengthens non-vehicular station access, it is important that system planning and development analyses carefully examine and disclose the levels of multi-modal access that different station locations may provide. We recommend that this data be better called out in the final EIS and, similar to the previous comment, be explicitly used to differentiate among station locations or alignments. Without better disclosure of how these analyses are performed and function, the value of the information is significantly diminished.

The Lynnwood Link Extension is an important long-range investment for our region. We commend Sound Transit again for the DEIS effort, and especially for the strengthened consideration of TOD potential. We appreciate the opportunity to comment and participate. If you have any questions regarding our comments, please contact me at (206) 971-3288 or snikolic@psrc.org, or our SEPA Responsible Official, Ivan Miller, at (206) 464-7549 or imiller@psrc.org.

Sincerely,

Sara Schott Nikolic, Principal Planner
Puget Sound Regional Council

Ivan W. Miller, SEPA Responsible Official
Puget Sound Regional Council

CC: Matt Shelden, North Corridor Light Rail Development Manager
Gil Cerise, Senior Transit Planner

Comments on the Lynnwood Link Extension Draft Environmental Impact Statement | Puget Sound Regional Council | September 25, 2013

3

available rights-of-way, topographical challenges, and built and natural environmental features.

L-015-003

The *Station Area Transit-Oriented Development Potential Report* was prepared by Sound Transit to help differentiate station options with respect to future development potential and is primarily based on existing conditions. This work was conducted while PSRC’s Growing Transit Communities Partnership (GTC) efforts were underway and Sound Transit reviewed and coordinated work accordingly. As noted in the comments above, the EIS is intended to disclose potential impacts that could occur with the development of the project alternatives, and to explore measures that would avoid, minimize, or mitigate impacts.

Sound Transit agrees that assessments of TOD as well as access are important elements of planning for stations, and the TOD report was available to the Board and the public prior to the identification of the Preferred Alternative. The updated report is similarly available along with the Final EIS; the EIS is not the only source of information that Board members consider in their decision-making. In addition, as described in Chapter 2 of the Draft EIS and the supporting Alternatives Analysis completed in 2011, Sound Transit considered TOD, access and other issues in detail along with a wide range of other factors as it defined the light rail alignment and station alternatives for the EIS.

Lynnwood Link Extension

Summer 2013



Draft EIS Comment Form

Submit your comments by September 23, 2013

NAME: Michael Mayes - Mayes Testing Engineers, Inc.
ADDRESS: 20225 Cedar Valley Road, Suite 110
CITY: Lynnwood STATE: WA ZIP CODE: 98036
EMAIL ADDRESS: MMAYES@MAYES-TESTING.COM
☐ Please sign me up for project email updates

Sound Transit wants to hear from you. Comments can be about anything related to the project, ranging from giving an opinion or observation to discussing technical aspects of the environmental analysis. The extended public comment period ends September 23, 2013. All comments received or postmarked by this date will be responded to in the Final EIS.

Comments

B-001-001

While I support light rail,
Segment C alternatives C1 and C2 appear to
have much more ^{negative} impact than C3. Both C1 and
C2 affect current quiet residential areas, wetlands
and businesses. C2 takes out my brand new
building! We employ 100 people.
C3 is on mostly undeveloped land. It seems
that the only reason not to build C3 is
that people would need to walk a bit further.
Seems like this could be easily mitigated by
re-arranging bus lanes.
Build C3!



B-001-001

Your comment stating a preference for Alternative C3, and describing the impact Alternative C2 would have on your business is noted.

B-002-001

Your preference for Alternative C3 is noted.

From: Brian Sodorff <brian@gmgloan.com>
Sent: Thursday, September 12, 2013 12:27 PM
To: Lynnwood Link DEIS
Subject: comment on transit station

B-002-001

If the transit station is anywhere other than the current location, we will relocate our business operations. We will not remain in any area of Lynnwood. This would be devastating for all of the small businesses. C3 would be the only location we could live with. All of our business associates in the area will do the same....

Brian Sodorff
Loan Officer, Lynnwood Branch - License # MLO-114429
Mortgage Capital Associates, Inc.
4610 200th Street SW, Suite D
Lynnwood, WA 98036
425-275-0600 Office
425-275-0610 Direct
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1000 1st Avenue, Suite 500
Seattle, WA 98104
www.soundtransit.com

ATTENTION: LAUREN SWIFT
Office: 206.501.6709
Fax: 206.501.2702

CH&

September 23, 2013

VIA EMAIL

Lauren Swift, Lynnwood Link Extension DEIS
Sound Transit
401 South Jackson Street
Seattle, Washington 98104

Re: Comments on Lynnwood Link Extension DEIS

Dear Sound Transit Board:

B-003-001

Cairncross & Hempelmann, PS, represents several local, national, and international real estate developers constructing and/or planning Transit-Oriented Development ("TOD") projects adjacent to existing and future Sound Transit light rail stations. Locating walkable, compact, and vibrant communities near transit stations serves the laudable goals of our regional transit system. First, it reduces household transportation costs, decreases overall regional travel time, increases the pool of workers and consumers for companies, and mitigates environmental problems associated with auto travel. Second, TOD projects increase transit ridership and revenue, which support the ongoing vitality of the transit system. Third, walkable, compact and vibrant communities near light rail stations improve the quality of life for those inside such communities, and also for the entire region by mitigating the many potential impacts of our region's rapid population growth.

Sound Transit has recognized these and other benefits of TOD projects in Resolution No. R2-2012-24 – Attachment A ("Sound Transit TOD Policy"). With regard to the planning and developing transit facilities, Sound Transit TOD Policy at Section 5(A)(2) specifically provides: "As Sound Transit progresses through the project development phases of its transit facilities...Sound Transit will [a]ssess the extent to which development of alignments, station locations, and transit support facilities affect and support implementation of...TOD strategies." Because TOD projects and the communities they create are so important to the success of the Lynnwood Link Extension and because our clients will be creating those TOD communities, we submit this comment letter to recommend the best station alternatives for successful TOD projects and, consequently, a successful regional transportation system.

Discussions concerning this
document are to be held in
the meeting room 414-4.005

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B-003-001

Thank you for providing your assessment of the transit-oriented development (TOD) potential for station alternatives considered in the Draft EIS. Sound Transit is committed to supporting TOD around its light rail stations. To that end, the agency's planning process has included public involvement and the evaluation of TOD potential for the station alternatives considered in the EIS. Sound Transit appreciates your recommendations.

B-003-002

Segment A: Northgate to Shoreline

The proposed station at NE 145th Street has great TOD potential. NE 145th Street is a major thoroughfare (SR 523). It will allow for increased accessibility to the station and adjacent TOD projects. Also, the proximity of 15th Avenue NE and its mix of uses will help draw passengers eastward from the station and facilitate the type of density needed between 15th Avenue NE and the station area.

The proposed station at NE 155th Street should be rejected. Station locations at NE 145th Street and NE 185th Street are preferable for several reasons. First, NE 145th Street (SR 523) has greater accessibility from the surrounding areas, including Bothell Way NE and Lake City Way NE (SR 522). The NE 145th Street station will serve the residents of Lake Forest Park, Kenmore, and Bothell, among others. Second, NE 145th Street is a main thoroughfare capable of handling the increased capacity of transit riders traveling to the station. Third, unlike NE 155th Street which is primarily a single-family neighborhood, NE 145th Street already contains a mix of uses nearby that will allow for a smoother transition to the kind of density that is appropriate near a regional light rail station. Finally, the City of Shoreline already has begun planning for increased density around the NE 145th Street station to facilitate TOD projects and the community and city-wide benefits they will provide. *See* City of Shoreline Comment letter dated September 16, 2013.

All of the Alternatives for Segment A include a station at NE 185th Street. Except for Alternative A-1, all of the Alternatives include a parking garage or parking lot immediately east of the station. A large parking structure adjacent to the station has the potential to discourage potential riders from walking or biking to the station. However, if carefully located, designed, and scaled, parking east of the station could be integrated successfully into a TOD community. Any parking should be integrated into the TOD community, rather than act as a physical or visual barrier between pedestrians and the station.

Conclusion: Alternative A-3 provides the best TOD potential for the NE 145th Street and NE 185th Street stations.

B-003-003

Segment B: Shoreline to Mountlake Terrace

Alternative B-4 should be rejected. It locates the Mountlake Terrace station within the I-5 median, which would not encourage pedestrian access from nearby residents. B-1, B-2, and B-2A are the better options for facilitating a successful TOD community.

Conclusion: Alternatives B-1, B-2, and B-2A provide the best TOD potential for the Mountlake Terrace station.

Segment C: Mountlake Terrace to Lynnwood

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B-003-002

Your preference for Alternative A3 based on your assessment of its TOD potential is noted. The Preferred Alternative incorporates several elements you identify as supporting TOD in the NE 145th Street and NE 185th Street station areas.

B-003-003

Your preference for Alternatives B1, B2, and B2A based on TOD potential is noted.

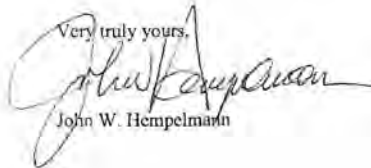
Lauren Swift, Lynnwood Link Extension DEIS
September 23, 2013
Page 3

B-003-004

Alternative C-1 provides the best TOD potential for the Lynnwood Park-and-Ride station. We disagree with the conclusion in the DEIS (see Table S-4) that the Alternative C-2 and C-3 station locations have the same development/TOD potential as C-1. C-1 is a shorter walking distance to the city center. Additionally, C-1 is located adjacent to several sites with strong development potential. Further, C-2 and C-3 are at a lower elevation than C-1 and therefore would require a more burdensome walk up the hill to the transit station, thereby discouraging ridership.

Conclusion: Alternative C-1 provides the best TOD potential for the Lynnwood Park-and-Ride station.

Thank you for consideration of our comments.

Very truly yours,

John W. Hempelmann

JWH:msd

{02396206.DOCX,1 }

B-003-004

While you conclude that Alternative C1 provides the best TOD potential, Sound Transit's TOD assessment summarized in Section 4.2.4 (Land Use Indirect and Secondary Impacts) of the Draft and Final EIS considers a wider range of factors than just the potential for redevelopment on immediately adjacent parcels. Sound Transit assessed TOD potential at the station areas using four elements: (1) existing conditions supporting transit-oriented development, (2) transit-supportive plans and policies, (3) station access, and (4) potential development opportunities.

CASCADE TROPHY

20815 52nd Ave W
Lynnwood, WA 98036

cascade.trophy@integra.net
(425)775-3109

September 22, 2013

Sound Transit DEIS
Comments, c/o Lauren Swift
401 S Jackson St.
Seattle, WA 98104

Dear Ms. Swift,

We lease commercial space located at 20815 52nd Ave West in Lynnwood, owned by Jeff Carter and Lisa Peterson. We have been in business since 1973 (40 years!), and at this location since 1994. The bulk of our customers are schools, churches, sports teams, clubs, and other groups from the nearby surrounding areas. With other trophy shops in close proximity to us, the fact that we have had long-term stability in one place has been a benefit to our business. We have watched other trophy shops move over the years and with that we have picked up MANY of their customers due to the fact it was no longer convenient to track down where they moved. We cannot afford to have the same thing happen.

B-004-001 We are writing to express our support for the alignments that do **not** run up 52nd Ave West. Alternatives C-1 and C-2 would have an extremely detrimental impact on us, forcing us to either move or sell our business, or to close up completely.

B-004-002 As we stated above...If we were to move, we would lose customers who have become accustomed to coming to the same location for some 20 years. At any new location, we would have to remodel the space to fit our needs, would have to move inventory and equipment, and change all of our advertising. All of this time and expense would result in significant lost income. It would be difficult to find a comparable location that has good parking, easy access to I-5 and I-405, a space that gives us both a working area and a retail store front – all at a long-term lease for the same rate.

The value of our business would be negatively impacted if we were to sell, because any new buyer would inherit the reduced street access, limited visibility, and other environmental impacts.

B-004-003 We are also concerned about the ability of our company to maintain the quality of work for which it is known. Our customers keep coming back because we offer them custom designs, excellent customer service, and always deliver a quality product. Vibration from either the construction and/or the train itself would make the laser, tools and presses that we use to both design and fabricate the awards more difficult to maintain and cause them to put out poorer quality. This could cause us to have to work our schedules around the construction or train interference and those times would not coincide with our customer base needs.

B-004-004 Noise is also an issue. When customers come to our shop, it is important for them to be able to communicate with us about their custom orders, and loud noises from either construction or the train would make that difficult. Plus we do a lot of communication on the phone as well. That can already at times be difficult but with this new possibility it would make it almost impossible.

B-004-005 We also live in this neighborhood – on 208th, just a few blocks away from our business. This area is both home and work, and the light rail, if situated on 52nd Ave West, would put both our house

B-004-001

Your concerns regarding the potential impacts of Alternative C1 and C2 to your business are noted.

B-004-002

Thank you for your comment about your concerns about business displacement under Alternatives C1 and C2.

If your business were to be displaced (which the Preferred Alternative avoids), Sound Transit would provide relocation services as well as compensation. An interview would be conducted to determine your needs for a comparable and affordable replacement property. Services would include ongoing information on the availability and lease costs of commercial properties meeting your needs. Compensation could include expenses related to finding a replacement property, existing tenant-owned improvements, permits and improvements at the new building, moving expenses, operating permits and licenses, as well as new advertising materials and stationary.

For additional information, please see Section 4.1 Acquisitions, Displacements, and Relocations.

B-004-003

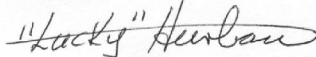
The Noise and Vibration Technical Report, included with the Final EIS on CD, has additional discussion of the standards used to define vibration levels and impacts for permanent or construction-related activities. Sound Transit does not anticipate vibration levels to disrupt normal operations at your business. Construction vibration mitigation described in the Final EIS would be implemented during work at the property, if Alternatives C1 or C2 were implemented. Where construction activity close to the building is unavoidable, Sound Transit would work with the owners/tenants to stage work in ways that would be less disruptive to their operations.

B-004-005

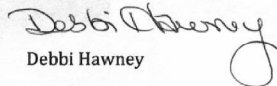
and business under the shadow of the light rail line, profoundly impacting our lives in every way possible. I (Lucky) am 77 years old and my business and home are all I have for retirement benefits. I (Debbi) am married but my husband is on disability, unable to work due to a brain tumor. My employment is crucial to being able to take care of our families every day needs, as well as, our future medical needs, which are immanent. As you can see the light rail line would be detrimental to our future well-being. And this is only our story!

This neighborhood is not only pleasant and family oriented but as a business we also provide work and opportunities for the children and single parents in the area. Serving and watching out for one another is what a neighborhood is all about. Please run the light rail alongside I-5 as far as possible before breaking off towards the transit center.

Thank you,



Lucky Hurban



Debbi Hawney

B-004-004

The FTA criteria for transit noise are based on exterior noise levels, which makes them a more conservative measure of impacts for interior noise. If your business is able to perform with the traffic noise in this area, noise from the light rail, while possibly audible, would not be expected to affect your operations.

For construction, the City of Lynnwood construction noise ordinance would be applicable, and Sound Transit is committed to maintaining construction noise levels within the criteria. Further, construction noise for this project is similar to construction noise for a paving project, building construction, or any other construction project, and Sound Transit works with local residences and businesses to minimize construction impacts.

B-004-005

Sound Transit notes your concerns about Alternatives C1 and C2. The Preferred Alternative does not use the 52nd Avenue W alignment, and would avoid impacting the businesses and residences along the street.

Jeff Carter and Lisa Peterson
20815 52nd Ave W
Lynnwood, WA 98036
lisapete56@comcast.net

September 21, 2013

Sound Transit
Draft EIS Comments
c/o Lauren Swift
401 S Jackson St
Seattle, WA 98104

Dear Ms. Swift,

We own property located at 20815 52nd Ave W in Lynnwood (tax lot numbers 27042100403600 and 4100). Our small business, JC Auto Restoration, Inc., is located in this building, as is our long-term tenant, Cascade Trophy. We appreciate this opportunity to submit our feedback on the Draft EIS for the proposed Lynnwood Link Extension Alignments.

We much prefer the alternatives that do not run up 52nd Ave West. Alternative C-3 and the City of Lynnwood's proposed C-4 alternative would have the least impact on our property and business, to Cascade Trophy, and be least disruptive to the neighborhood. If Sound Transit were to acquire all, or a portion, of our property, it would have a huge impact on us personally, on our business, and on our tenant's business.

Jeff is self-employed and has no employer-established retirement fund. In the late 1990s, our business was outgrowing its location. As we looked for a new space, Jeff also looked to see what other people were doing who were in a similar line of work. The only ones who could retire were those who owned their shop property. The rest were working into their 70s and 80s, just scraping by. In 2000 we took out all of the equity we could from our home, and purchased this commercial building. It would be both the new location for the shop and our investment in Jeff's retirement. For many years our income and cash supply was greatly restricted because of this purchase. We felt that in the long run, it would give us good retirement income, whether we decide to lease the space once Jeff is no longer working, or if we sold the building. We will have it paid off in 2025.

If the Lynnwood Link Light Rail were to run on Alignments C-1 or C-2, Sound Transit, as we understand it, would acquire either part or all of our property. In either case we would lose market value and future income for Jeff's retirement.

If Sound Transit were to acquire the entire property, we would lose our existing tenant, Cascade Trophy, and have to relocate our business. We would lose future rental income, and depending upon the replacement building, lose future increase in property value as well. If JC Auto Restoration had to move, we would have to move all of our equipment, customized shelving, tools, customer cars and extensive vintage auto parts inventory. The estimated time to pack up, remodel the new building as needed, set up, and return to normal business operations is over one year. We would likely have to lay off our employees, Jeff would lose all personal and business income for this time, and JC Auto Restoration would be responsible for significant unemployment taxes for our employees for several years. Many customers would go elsewhere and not return, resulting in loss of future business.

Even if Sound Transit were to acquire just part of the property for the right of way and/or pylon placement, we would see a significant negative impact. Not only would the value of the property drop, but the rate that we could charge to future lease-holders would drop as well.

Our current tenant, Cascade Trophy, has been one of the best tenants you could ask for. They have been at this location since before we bought our building. We rely on their rent for our mortgage payment, and if Sound Transit were to choose alternatives C-1 or C-2, the chances are excellent that the owner, August "Lucky" Hurban, would either sell the business to a new owner at a new location, or

B-005-001

Thank you for your comment stating a preference for a modified Alternative C3. Sound Transit identified a modified Alternative C3 as its Preferred Alternative in the Final EIS, and this alternative would avoid impacting your property and business. Please note that Sound Transit policy provides for a fair and equitable means of addressing real property impacts across its projects. Consistent with state and federal law, this policy requires Sound Transit to fairly compensate for property acquisitions, and to provide compensation and relocation for displaced businesses. If an alternative affecting your property were to move forward, Sound Transit would work with you and any affected businesses to negotiate fair compensation and relocation benefits.

B-005-001

B-005-001 would close completely. In either case, we would lose an outstanding tenant. It would be extremely difficult, if not impossible, to find a new tenant who would be willing to pay the same rate per square footage, would need no modifications to the space, and would commit to a long-term lease.

B-005-002 Like all retail businesses, both JC Auto Restoration and Cascade Trophy need easy in-and-out street access for customers, good visibility from the street, and adequate parking. Cascade Trophy frequently has people driving in to drop off and pick up orders. JC Auto needs ample parking, with a large enough area for an enclosed car hauler to safely drop off and pick up customers' valuable vintage automobiles. It also needs comfortable access to its two garage doors, keeping in mind that vintage automobiles have a wider turning radius than a modern subcompact, and require more space for maneuverability. Both Cascade Trophy and JC also need access for delivery trucks on a daily basis.

B-005-003 The vibration of both the construction and the running of the light rail could have a negative impact as well. Cascade Trophy uses sensitive laser cutting equipment to etch sophisticated designs and lettering on plaques, trophies, and signs. JC Auto uses vintage equipment to calibrate and adjust gauges, speedometers, automotive record players, and other electrical and mechanical components of antique automobiles. All of these tools are affected by vibration, as are their computers and security systems.

B-005-004 Noise is a concern as well. It is already difficult to have a conversation outside, especially on the phone, over the freeway noise, and it would be impossible over the sound of either the construction or the train itself. We anticipate that during construction there will be significant noise impacts even inside the building, which will greatly affect communication with customers for both companies.

B-005-005 On a larger scale, we are concerned about the wider impact on the neighborhood if alignments C-1 or C-2 are chosen. The small businesses in the area provide employment for local residents. Many of have been in the same location for years, if not decades, providing stability and income to the area. Relocating the DSHS, Vocational Rehabilitation and Work Source offices would be a hardship for economically disadvantaged and disabled individuals. The 2010 census shows that this area is home to a high percentage of individuals who live in rentals, are from minority backgrounds, are low income, have never gone to college, and who speak a language other than English at home. Some are more recent immigrants who do not have full awareness of how they can express their opinion about this decision. Many come from countries where the population – particularly the women – not only does not, but cannot, participate in the political process. Many are children. Therefore, a significant percentage of the population affected may be essentially without a voice in this process.

B-005-006 We would much prefer to have the Link Extension Alignment sited parallel to the freeway rather than on 52nd Ave West. This option would preserve parkland, residences, apartment buildings, and businesses – including our own – and would be the least disruptive to the community.

We have participated in Sound Transit information sessions, as well as sessions hosted by the City of Lynnwood. Those meetings have been informative and helpful, particularly the ones hosted by Sound Transit. Thank you for giving the community opportunities to learn about the project and provide feedback.

Sincerely,

Jeff Carter
Owner, JC Auto Restoration, Inc.
www.jcauto.com
206-375-2696

Lisa Peterson, MS
Director, UW GenOM Project
<http://depts.washington.edu/genomics/index.shtml>
206-499-6085

B-005-002

Thank you for your comments about property access, parking, and circulation needs for your property at 52nd Ave W. If Alternative C1 or C2 is selected for the project to be built, properties that are not fully acquired would retain their functional access, and would have sufficient levels of parking, circulation, and freight/delivery accessibility as needed for their operations.

B-005-003

The Noise and Vibration Technical Report accompanying the Final EIS has additional discussion of the standards used to define vibration levels and impacts for permanent or construction-related activities. Sound Transit does not anticipate vibration levels to disrupt normal operations at your business. Construction vibration mitigation described in the Final EIS would be implemented during work at the property as appropriate, if Alternatives C1 or C2 were implemented. Where construction activity close to the building is unavoidable, Sound Transit would work with the owners/tenants to stage work in ways that would be less disruptive to their operations.

B-005-004

The FTA criteria for noise are based on exterior noise levels, which makes them a more conservative predictor of potential impacts for noise-sensitive building interiors. If your business is able to perform with the traffic noise in this area, noise from the light rail, while possibly audible, would not be expected to affect your operations. Light rail is typically quieter than the heavy trucks on the roadway near you.

For construction, the City of Lynnwood construction noise ordinance would apply. Sound Transit expects to limit construction noise levels to be within the City's criteria. Further, construction noise for this project is similar to construction noise for a paving project, building construction, or

any other construction project, and Sound Transit works with the city, local residences and businesses to minimize construction impacts.

B-005-005

Sound Transit appreciates your concerns about the potential community impacts of Alternatives C1 and C2. As described in your comments, the Lynnwood community is very diverse and includes racial and ethnic minorities, persons with limited English proficiency, and those with low and moderate income. As part of Sound Transit's community outreach efforts during project planning and the environmental review process, special outreach activities have been conducted to involve these community groups in the public decision-making process leading to the selection of a preferred alternative for the Lynnwood Link Extension project. These efforts included the availability of translated materials and interpreters upon request. See Chapter 7 of the Final EIS for a summary of the public comments received on the Draft EIS and Appendix C for a listing of outreach activities and comments specifically targeted for minority and low-income populations.

B-005-006

Your preference for an alternative parallel to the freeway rather than on 52nd Avenue W due to business impacts and impacts to Work Source are noted.

MULLALLY DEVELOPMENT COMPANY

REAL ESTATE DEVELOPMENT & MANAGEMENT

2825 EASTLAKE AVENUE E., SUITE 250
SEATTLE, WASHINGTON 98102
OFFICE (206) 362-1600
FAX (206) 362-4052

September 23, 2013

Via Email: lynnwoodlinkdeis@soundtransit.org

Sound Transit
Attn: Lauren Swift, Lynnwood Link Extension DEIS
401 S. Jackson Street
Seattle, WA 98104

Re: Comments on Lynnwood Link Extension Draft Environmental Impact Statement
(Draft EIS)

Dear Ms. Swift:

B-006-001

We are the owners of the Northgate Plaza Apartments property at 11200 1st Avenue NE, north of Northgate Way and east of Interstate 5/1st Avenue NE. All of the Segment A alternatives place the light rail line between our property and the freeway. The Draft EIS acknowledges adverse impacts to our property and the need for mitigation. However, we do not believe the Draft EIS analysis fully takes account of the impacts to our property, in part because portions of the analysis are based on the existing use of the property, and not its planned use. We offer the following comments to be considered in preparation of the Final EIS and in implementation of the project.

Information about the Northgate Plaza Apartments Site

Our property is approximately 7.86 acres in size (342,548 square feet). It is presently developed with 34 one-story to two-story apartment buildings with 207 units that were constructed in 1951. In recognition that the existing buildings are nearing the end of their lifespan and require frequent repair to maintain them as rental units, we have spent a substantial amount of time and effort working with the City of Seattle on future development options for the property. The property is located within the Northgate Urban Center, and the City's Comprehensive Plan calls for much greater density than exists on the site at present.

In 2010 we proposed a rezone of the property from a Midrise to a Neighborhood Commercial 3 – 85 foot height limit designation. The purpose of the zoning change was to accommodate future mixed-use, commercial and multi-family residential development of substantially greater density. This zoning change was unanimously approved by the Seattle City Council in November 2012. The zoning change resulted in an increase of nearly 600,000 square feet of allowable building square footage. The new site zoning allows a wide mix of commercial and residential uses totaling over two million square feet of development.

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B-006-001

Thank you for writing of your concerns about the potential impacts to your property at NE 11200 Street and First Avenue NE, and for describing your plans for the property.

The analysis of land use impacts in the Final EIS is based on existing land uses, approved land use plans, and other permitted developments. The potential for impacts is discussed in in Section 4.2.2 Long-Term Impacts. A site-specific analysis of potential impacts to a future development in the absence of approved plans or permits would be speculative, and therefore not considered in the EIS. However, in Appendix 4.2.2, Sound Transit has reviewed the consistency of the proposed alternatives against adopted plans and policies of the city, including the City of Seattle's Northgate Urban Center, and finds that the alternatives would support the City's intent to create a more compact urban center in the area. In addition, based on the current designs for the Preferred Alternative, the project would be across the street from your parcel and would not place any new restrictions on the use of your property.

B-006-001 Since the time the rezone was approved, we have identified development concepts for the property and anticipate proceeding with initial City approvals for portions of the site next year. Development along the eastern edge of the site, in proximity to the proposed light rail route, is anticipated to consist of office, hotel, and assisted living or multi-family residential uses. That development will be able to utilize the full allowed zoning height of 85 feet.

Comment on Preferred Alignment

B-006-002 Of the alternatives presented in the Draft EIS, we prefer Alternative A1 as it locates the alignment furthest from our property line and proposed development. The other alternatives come fairly close to the northwest corner of our property and could impair access to our site. Development options for the property have envisioned an internal access road along our northern property line, with a driveway at the northwest corner of the site. Thus, an alignment in close proximity to that corner is problematic in terms of our future development options and access.

We would appreciate the opportunity to meet with Sound Transit to obtain further information on the exact distance of the alignment and its associated structures vis-à-vis our property line.

B-006-003 **Access Impacts**

The Draft EIS states that the project would cause the adverse impact of “reduced access” to our property in particular. Draft EIS, p. 4-206. However, in the section on Transportation Construction Impacts, the Draft EIS states that “Local access would be maintained.” The EIS needs to have a more complete discussion of access impacts on particular properties, such as ours, during the construction process. There should be a commitment to work with property owners in devising appropriate mitigation for those impacts.

In addition, there needs to be full disclosure of any long-term access impacts and a commitment to appropriate mitigation.

B-006-004 **Noise and Vibration Impacts**

Given the proximity of the alignment and inclusion of crossover switches, the Draft EIS acknowledges that at and near our property, noise and vibration impacts would be “moderate to severe for all alternatives” unless mitigation is implemented. The Draft EIS states that mitigation would be incorporated as part of the project, but then states that it is “Sound Transit’s policy” to mitigate noise that would otherwise result in moderate or severe impacts. Draft EIS, p. 4-125. However, mitigation of impacts (both noise and vibration) should be more than a matter of “policy” and instead should be clearly incorporated into the project as required mitigation.

B-006-002

Your comment in favor of Alternative A1 is noted Alternative A1 is the basis for the Preferred Alternative, which would be across 1st Avenue from your property. Based on current plans for construction, there would be no physical impacts to your property and no changes to your access due to the light rail project.

B-006-003

The Draft EIS text regarding "reduced access" in the cultural resources section of the document referred to construction period effects, but a revised description in the Final EIS clarifies that access could be modified. Access would be maintained, consistent with the text in the Transportation Technical Report. There could be modified access for travel from some directions during construction periods, such as when flaggers are present on 1st Avenue or other nearby streets to accommodate construction activities. Delays could occur, but access to adjacent properties (land and buildings) would be maintained. Depending on required construction activities, access to the property may need to be reduced (e.g., one lane instead of two lanes) or otherwise altered (e.g., short-term reroute of the access) from conditions prior to the start of construction. Parcel-specific details would be determined during final design, in coordination with the City of Seattle and affected property owners. Section 3.6.9 also lists a variety of mitigation measures that Sound Transit will use to reduce impacts on adjacent property owners, residents, and businesses. These include communication about construction activities using a variety of methods and obtaining written permission from property owners to make temporary changes to access. Moreover, should construction activities require temporary use of a small portion of your property, then the conditions of use would be negotiated in a legally binding temporary construction easement.

B-006-005

Historic Resources

The Draft EIS concluded that the Northgate Plaza Apartments are eligible under Criterion C for listing on the National Register of Historic Places (NRHP). We do not agree with that conclusion. And we note that a private property may not be nominated for or placed on the NRHP unless the private property owner agrees.

As part of our rezone process, the history of site development was fully documented. That information was then reviewed by City Staff and resulted in a determination by the City of Seattle Landmarks Preservation Board that the structures were unlikely to meet the standard for designation as historic landmarks. (Department of Neighborhoods, LPB 58/11). This determination governed for purposes of the State Environmental Policy Act and City review of the rezone.

It should be noted that although there are some differences between Seattle Landmark criteria and NRHP criteria, NRHP Criterion C (under which our buildings are considered eligible by the Draft EIS) is in substance the same as the City's Landmark criteria. Thus, the City's determination of non-eligibility should be factored into the analysis in the Sound Transit EIS.

Conclusion

We appreciate your consideration of our comments and would welcome the opportunity to discuss the project with you further.

Very truly yours,



Vincent J. Mullally
Managing Member, Northgate Plaza LLC

B-006-004

Sound Transit's policy is to mitigate noise and vibration impacts consistent with federal, state, and local criteria. Section 4.7.7 of the Draft and Final EIS identify potential mitigation to be incorporated into the project. Mitigation measures may be refined during final design but will continue to meet applicable federal, state, and local noise criteria.

B-006-005

Federal agencies must comply with Section 106 of the National Historic Preservation Act, which addresses properties eligible for listing in the National Register of Historic Places (NRHP). Local land use and landmark decisions are not relevant to NRHP eligibility. While the designation criteria are similar, their application by the Washington Department of Archaeology and Historic Preservation (DAHP) and the Seattle Landmarks Preservation Board may differ. FTA determined, and DAHP concurred, that the Northgate Plaza Apartments are eligible for NRHP listing because they are an intact example of a particular type of apartment complex typical of the post-war era. This determination does not constitute nomination to the NRHP and owner consent is not required.



R. Gerard Lutz
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September 23, 2013

Via Email and US Mail

Sound Transit DEIS
Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104
LynnwoodLinkDEIS@soundtransit.org

Re: Lynnwood Link Extension Draft Environmental Impact Statement ("DEIS")

Dear Ms. Swift,

On behalf of the Northgate Mall Partnership, which is owned by the Simon Property Group (collectively "Simon"), we submit the following comments with respect to the DEIS. Simon owns and operates the Northgate Mall ("Mall") located in the Northgate neighborhood in Seattle (located between Northgate Way and NE 103rd Street and 1st and 5th Avenues NE). The Northgate Mall is located at the terminus of Sound Transit's proposed Northgate Link and the beginning of the proposed Lynnwood Link.

Simon is the largest retail real estate company in the world. Simon owns or has interests in 325 properties throughout North America and Asia. In Washington, in addition to the Mall, Simon owns the Tacoma Mall, Columbia Center Mall in Kennewick, North Bend Premium Outlets, and Seattle Premium Outlets in Tulalip. A number of Simon's mall properties are located at or near public transit/rail stations, including on the west coast the Fashion Valley Mall (San Diego Trolley), and Stanford Mall and Stoneridge Mall in the Bay Area (BART), with Stoneridge experiencing the addition of a new BART stop and BART parking deck in 2011. Simon has extensive experience from these projects – both in the effects and potential mitigation of their cost, construction/implementation and post-construction operation – that it believes is relevant to evaluate and consider in order for Sound Transit to improve its plans, lower its project costs, and avoid, reduce and mitigate its impacts on the Northgate Mall and its neighbors.

B-007-001 The probable significant, unmitigated, direct, indirect and cumulative adverse environmental impacts of Sound Transit's proposed Lynnwood Link Extension, the Northgate Extension, together with King County's more recently unveiled plans for transit-oriented development on the current Northgate Transit Station site (proposed for the property directly to the south of the Northgate Mall) that Sound Transit is facilitating, hereafter collectively referred to as the "Projects", will be substantial, particularly with the traffic and overused public parking impacts that already exist and the many years of continuous construction and traffic impacts from the Projects that will persist in the future.

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Perkins Coie LLP

B-007-001

Sound Transit, King County, and the City of Seattle have been involved in planning transit improvements and related developments in the Northgate area for over a decade. The projects and plans to extend high-capacity transit to and beyond the Northgate transit center reflect the designation of the Northgate area as a regional growth center. Sound Transit is committed to working cooperatively with Simon, other stakeholders, the City and King County throughout the development of the Northgate Link Extension, as well as for the future Lynnwood Link Extension.

There is also a long history of environmental documents examining environmental impacts and identifying mitigation commitments for the Northgate Link Extension, and now for the Lynnwood Link Extension. (The King County Transit Oriented development project has not yet advanced to the stage of planning or permitting involving environmental review.) The extension to a station at Northgate was originally part of the Central Link Draft and Final EIS (1998-1999) and the subsequent North Link Draft and Final Supplemental EIS (2002-2006).

In addition, the Lynnwood Link Extension Draft and Final EIS examine direct, indirect and cumulative impacts in Chapters 3 and 4 (in direct, indirect as well as cumulative effects discussions by environmental topic). The primary other project discussed in the Northgate area is Sound Transit's Northgate Extension, which is assumed under the No Build Alternative, as is the underlying growth in development, population and employment for the Northgate area and the region through 2035. (Plans for King County's Transit-Oriented Development project remain conceptual).

As the following responses to comments explain, Sound Transit expects that many of the primary issues of concern in your letter (largely traffic and construction period impacts) will be resolved through continued

- B-007-001** The Projects will impact:
- Mall traffic ingress, egress and access at several key points,
 - visibility and clarity of mall access for customers from I-5 and 1st Avenue NE,
 - visibility of the Mall - interrupted in the short to medium term with construction, and in the long term freeway views will be permanently diminished or blocked (which are key for these type of regional retail facilities that serve large (300,000+) population bases),
 - traffic on the roads and arterials surrounding the Mall from the initial planned work on Northgate Station facilities as early as 2014, to 2023 upon expected completion of the Lynnwood Link line,
 - exacerbation of the already existing "Hide and Ride/Park" problems in the vicinity, associated not only with undersized Metro park and ride facilities, but also other undersized public parking facilities such as the local library branch to the east of the Mall, and
 - Mall patron parking and circulation due to the proposed use of the most heavily patronized Mall parking lot as both a long-term construction staging area for both the Northgate Station and Extension and the Lynnwood Link Extension, and potentially for placement of a Sound Transit park-and-ride garage on Mall property if not placed on King County's current Transit Station site.
- B-007-002** There are substantial reasons to be concerned that the cumulative impacts of the Projects will be very disruptive to the Mall and its commercial and residential neighbors, for perhaps as much as ten years of continuous intensive construction activity, as well as the longer-term conditions with the transit network in place and the significantly higher density development occurring immediately surrounding the 60+ year old facility.
- Simon has engaged Transportation Engineering NorthWest ("TENW") to conduct a more in-depth analysis of potential impacts and expects a formal report of their findings later in October 2013. Simon will supplement these comments with TENW's report when completed.
- B-007-003** To help address and minimize impacts to the Mall and surrounding business and residential neighbors, it is critical that Sound Transit carefully consider and coordinate construction plans and cumulative traffic for the Northgate Extension with the Lynnwood Link and Metro's plans for transit-oriented development (TOD) south of the Mall, for:
- (a) the potential overlapping construction periods prior to the opening of the Northgate Station,

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coordination for the final design and construction planning work for the Northgate Link Extension. This approach is consistent with the impacts and mitigation commitments originally defined in the North Link Final EIS and its Record of Decision. Many of the areas that are identified as sources of concern in your letter would not be further aggravated by the construction and operation of the Lynnwood Link Extension. The Lynnwood project would be less intensive and more physically removed from the Northgate station and transit-oriented development (TOD) areas, bringing a lower potential for higher cumulative impacts than for any of the other projects alone. In addition, the development of the Lynnwood Link Extension would actually reduce the number of riders/patrons needing to access the Link system at Northgate, which would lessen rather than increase long term traffic compared to the Northgate Link Extension alone.

To help further illustrate this point, the Final EIS for the Lynnwood Link Extension has updated its discussion of the Northgate Link Extension and has added a description of the King County TOD project. In earlier planning for the Lynnwood Link Extension Draft EIS, Sound Transit and the City of Seattle considered intersections of concern for worsened conditions with the Lynnwood Extension, and had concluded that no adverse impacts were likely because the Lynnwood Link project would reduce the number of trips destined to Northgate. Finally, Sound Transit has developed further information on its planned construction approaches, and is incorporating the latest information on the Northgate Link Extension's construction program, and further discussions of these issues are included in the Transportation Technical Report.

B-007-002

Sound Transit does not anticipate a continuous 10 years of major construction activities for the combined projects. The Lynnwood Link Extension's major construction activities near Northgate would be about one year, shorter than the other projects, and involving primarily the

B-007-003

(b) the construction window for the Lynnwood extension coupled with the anticipated extraordinary use of the area around Northgate Station for parking for commuters when Northgate Station is open, but Lynnwood is still under construction, and

(c) for the longer term conditions when the Lynnwood Station is finally open, and Northgate area is no longer the critical transfer point from automobiles to transit for the general public.

The analyses should also include understanding the relationship between what is already a fully utilized park-and-ride condition today, how that will change when the Northgate Link is open and the end node for commuters from the north, and considered in concert with the potential loss of the existing surface lots of the Metro Transit Center today for planned TOD development over that entire site. Simon expects there to be a period of time before the Lynnwood Link is open when there will be an extraordinary burden on parking, as well as on traffic in the areas as noted above, but the unique impact to the Mall for the likelihood of significant commuter use of the Mall's private parking (as "park-and-hide" or "hide and ride") that is provided for, required for, and intended for the Mall's retailers/customers. This "hide and ride" activity would be a direct impact to the Mall and in direct conflict with the Mall's operating hours. The Mall's neighbors, both business and residential, face similar burdens that will be dramatically exacerbated by Sound Transit's plans for North Link and Lynnwood Link, and King County's related "Transit Oriented Development" proposal.

This is of significant concern, especially for those weekday evenings when commuters have not returned to their cars and Mall customers cannot find parking because commuters (who have parked on the Mall property all day) are still occupying spaces in Mall lots (and most likely the most preferred spaces along the west side of the Mall). If Sound Transit's expectations regarding ridership are even remotely realized (recognizing that the State's auditor has found them to have been overstated and has requested they be reconsidered), the problem will likely be worse on local sports weekends for Seahawk and Husky games, and on the evenings throughout the spring, summer and early fall for Mariner games, when Mall parking is in most demand for shopping. These are real, foreseeable adverse impacts and ones Simon has experienced elsewhere that should reasonably be expected to occur once the Northgate Station and Link opens. Moreover, the impacts will continue to be exacerbated by the overlapping continuation of construction of the Lynnwood Link, and would be further exacerbated by potential implementation of a high density TOD on King County land that would shift the existing substantial parking demand off of that site, and most likely onto the Mall's, and add to the area's already strained traffic and parking demands.

Simon has been working with Sound Transit staff on ways to minimize construction-related parking impacts to the Mall, such as by placing the proposed Sound Transit/Metro park-and-ride garage on the Metro site to the south of the Mall. But to this point, those discussions have been looking at the Northgate Station and line extension project in a vacuum. As this next phase (Lynnwood Link) takes form, and the potential of a fully utilized King County TOD starts to take shape, the impacts on the Mall property and on the surrounding community must be analyzed in

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construction of the guideway adjacent to the I-5 right of way. This would be north of the areas where the Northgate Station, park-and-ride, and Metro's Transit Oriented Development project would occur.

The analysis of traffic in the EIS through 2035 considers an underlying increase in traffic growth in the area due to the planned growth in jobs and housing in the Northgate Urban Center. The major investments in transit in the area have been considered in the analysis of traffic. This was the method used for the assessments of traffic for the Lynnwood Link Extension, as well as for the Northgate Link Extension.

For both projects, Sound Transit's mitigation commitments include measures to maintain access to the mall and surrounding neighborhoods, and to work with the City, County, Simon and other stakeholders to minimize impacts.

B-007-003

The North Link Final SEIS included a detailed review of parking impacts for the project and identified mitigation where appropriate. Sound Transit agrees that the planning and coordination of overlapping construction activities would help reduce individual as well as potential cumulative effects to traffic, access and parking. The Final EIS identifies such coordination as a mitigation measure for cumulative effects in section Section 3.6 of the Final EIS. The potential TOD on King County Metro property has not been reflected in Sound Transit projects' construction traffic analysis because there are no detailed plans available for that project, including a proposed date for construction. However, Sound Transit expects the development would be within assumed future growth in traffic levels that are already assumed as part of the No Build Alternative for the area, which incorporates more jobs, housing and trips in the Northgate district. In addition, park and ride supply at the Northgate Station is expected to be fully occupied. As the Lynnwood Link Extension project would include stations with new park and ride facilities

B-007-003 their totality, not segmented. Discussions between Simon and Sound Transit staff are ongoing, and we hope to develop better mitigation through those processes that should be included as part of Sound Transit's final Lynnwood Link EIS, and likely in a supplemental EIS for North Link, particularly if King County's proposal to convert its existing park and ride lot to a transit oriented development (eliminating the already oversubscribed parking) is not abandoned or at least substantially modified.

B-007-004 **I. Other Projects Considered for Cumulative Effects.**

In Appendix H, Sound Transit identified certain other projects that are "reasonably foreseeable" as part of the analysis of cumulative effects and the predictions of conditions for the future regional transportation system. However, Sound Transit did not identify the North Link Station and Extension nor the King County Metro Northgate TOD Project in the cumulative effects analysis. Both of these should be considered in the EIS analysis, and particularly in the Transportation Technical Report analysis to address private property and local circulation impacts to the Mall and other immediately surrounding businesses and residential neighborhoods. These projects should not be considered as "baseline" existing infrastructure.

B-007-005 **A. North Link.**

As you know, the North Link and Lynnwood Link are two "phases" of Sound Transit's larger light rail system plans. The North Link phase is essential to the purpose and function of the Lynnwood Link phase, and the North Link impacts should be considered in the Lynnwood Link EIS analysis. To that end, the Lynnwood Link DEIS should reconsider the Northgate Station Area local area traffic circulation, parking, and construction impacts along 1st Avenue NE, NE Northgate Way, the local freeway interchange system with I-5, Mall access and parking, all in an effort to address impacts in a comprehensive manner. In addition, alternatives presented in the Lynnwood Link DEIS demonstrate a "range" of ridership impacts that would occur at the Northgate Link Station area, yet no evaluation of increased parking or local area traffic impacts that would occur as a result of these ridership levels are evaluated. For Simon and its neighbors, it is crucial that Sound Transit consider how to best coordinate the construction and design of both phases in order to minimize long-term and short-term transportation and construction-related impacts to the Mall, located at the proposed intersection of these two phases.

B. King County Metro Site - Transit Oriented Development Plans.

B-007-006 The North Link Final SEIS (2006) included the following description for the transit oriented development plans for the Metro site south of the Mall:

"King County Metro: Northgate Transit-Oriented Development Project

King County is planning a high-density, mixed-use urban development on the existing Northgate Transit Center site. The site will continue to be an important transfer point and could accommodate additional services such as a light rail

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to the north of Northgate, capturing trips to the north, this would help reduce demand for parking spaces at the Northgate Station, and is projected to reduce bus trips and vehicle trips as well, compared to levels experienced with the Northgate Extension alone.

B-007-004

The Northgate Extension is considered as part of No Build because the decision to build and operate the Northgate Link Extension has been made, the project has completed its environmental review, and it is fully funded. It will be in place and operating before the Lynnwood Link Extension is completed. The King County TOD project at Northgate has been added to this list of projects considered in the cumulative effects analysis in Final EIS, although further details and timing of the project remain unconfirmed at this time. In addition, in response to your comment, the cumulative construction effects for all three projects together are now discussed in more detail in the Final EIS, including in Chapter 3 of the Final EIS, as well as in the Transportation Technical Report.

As noted above, in terms of long term impacts, the Lynnwood Link Extension would attract transit trips to the north of the Northgate Station, which would help reduce demand for parking spaces at Northgate, and would reduce bus trips and vehicle trips as well, reducing the potential for adverse cumulative effects.

B-007-005

Based on modeling data for the Lynnwood Link Extension, which shows lower ridership and reduced trips to Northgate after Lynnwood Link opens, Sound Transit projects decreased transit-related traffic accessing Northgate. This supports a conclusion that there are no additional Link-related parking and traffic impacts in the Northgate Station area due to the Lynnwood Link Extension, and a detailed reexamination of long term

B-007-006

station. The existing capacity of the four park-and-ride lots in the Northgate area is approximately 1,400 stalls. The TOD project would replace these stalls and provide more spaces for commercial and residential use. Two new parking structures with 575 apartments; retail, restaurant, health club, hotel, or office space; a cinema; and a daycare center above the parking structure on the south lot are planned. A second parking structure at the northeast corner of First Avenue NE and NE 103rd Street would serve the north end of the future light rail station. Traffic congestion on First Avenue NE and Fifth Avenue NE would be relieved by intersection and signal improvements, additional lanes on NE 103rd Street, and the creation of a new street, Third Avenue NE, that connects the existing office park south of NE 100th Street with the mall north of NE 103rd Street. King County could "surplus" the park-and-ride lot at Fifth Avenue NE and NE 112th Street, located next to Target and Best Buy, giving the City of Seattle the opportunity to purchase it for creation of a park. By relocating the Northgate Transit Center to 1st Avenue NE, King County could provide excellent connections for passengers transferring between Metro buses and the future Sound Transit light rail station. King County Metro Transit and the City of Seattle have tentatively agreed that this proposal should be considered for further study. King County is studying the feasibility of sustainable building practices, such as "green roofs" for the buildings. Stormwater from the TOD project would be detained on site and potentially directed to the City of Seattle's stormwater treatment feature, "the Channel" at Thornton Creek. The following projects describe the development in Northgate in more detail . . ."

Source: North Link Final SEIS (2006), Appendix P4.18: Cumulative Effects Information at p. P4.18-3.

However, Appendix H of the DEIS does not identify the Metro Northgate TOD Project as a project considered in the cumulative effects analysis. This project should be included in the analysis, particularly if Sound Transit plans to support this project by building the mitigation/replacement park-and-ride garage on the Mall site. And, in addition, the potential impacts of the TOD if Lynnwood Link is NOT constructed, or even significantly delayed, should also be considered, since Sound Transit cannot guarantee Lynnwood Link's construction, let alone that it will be completed on schedule.

II. Impacts to Mall Access.

B-007-007

Figure 6-1 of the DEIS Transportation Technical Report (July 2013) shows a proposed construction staging area located on the Mall's western parking lot just south of NE 107th Street, with truck haul routes to and from the staging area and I-5 through the NE 107th Street on-ramps and off-ramps and also having truck haul routes use 1st Avenue NE north of NE 107th Street. There is also a note on Figure 6-1 that there may be "Temporary Closures (e.g., structure placement)" on the Mall parking lot. In addition, Sound Transit has plans (i) to use the Mall site for construction staging for the Northgate Station from 2016-2019, (ii) to temporarily take the

traffic conditions near the station is not necessary as part of the Lynnwood Link Extension.

B-007-006

Appendix H in the Final EIS lists the King County TOD project as part of the set of projects considered for long term and construction cumulative effects. Individual environmental topics also have added discussion where relevant, including in transportation (Chapter 3) and Land Use (Chapter 4, Section 4.2). If construction for the Northgate Link Extension and Lynnwood Link Extension overlap, Sound Transit will coordinate the separate projects to minimize traffic impacts during construction, as described in Section 3.6.9 of the Final EIS. The Lynnwood Link Extension is not proposing additional parking in the Northgate area, and because the King County TOD is not a Sound Transit project, Sound Transit is not responsible for addressing impacts of that project, whether or not Lynnwood Link is constructed. The King County TOD project remains conceptual at this point, and with its elements or construction timing yet to be determined.

B-007-007

The indication of a construction staging area within the mall property in Figure 6-1 of the Transportation Technical Report is primarily related to the Northgate Link Extension, but Sound Transit is working with Simon Properties to allow the site to be used for an early element of Lynnwood Link Extension, which should help reduce overall construction durations for the two projects in this area. Parking impacts associated with Northgate Link Extension construction and operation are addressed in the Final SEIS and ROD for the Northgate Link Extension (known as North Link at the time of the Final SEIS).

- B-007-007** parking lot at the southeast corner of the Mall site and apparently use it to mitigate Sound Transit's parking impacts during the Maple Leaf portal construction, and (iii) to permanently take a portion of the Mall parking lot on the southwest corner of the Mall site in order to build a Sound Transit/Metro park-and-ride garage so as to facilitate Metro's TOD plans. These actions could reduce the Mall's total private parking by 15% to 20% when overlapped, and create real and enduring parking problems in the area for the Mall and its neighbors, for years. This is not "temporary" from the Mall's perspective. And, it will exacerbate the existing "Hide and Ride" problems for all of the local area residents.
- B-007-008** Further, it appears possible that as part of the pending Northgate Station construction effort, Sound Transit may also attempt to close off one of four key access points off of 1st Avenue to the Shopping Center (105th private) for some portion of the suggested 40 month utilization of the Mall site for this temporary Northgate Station construction staging. The traffic impacts associated with the removal of access from the Mall's most heavily utilized parking fields, for several months, rerouting customers from the most heavily used parking fields on the west side back around to the 5th Avenue lots, and transporting the primary customer traffic that arrives from I-5 around on the adjacent streets to account for these significant changes during construction, have not been properly analyzed. This will be further exacerbated if the Lynnwood Link or King County TOD work overlaps, do not adequately account for cumulative parking and traffic pattern changes that ultimately push those burdens on the Mall, or both. The secondary neighboring streets are not designed to handle these burdens, so again there will be burdens not just on the Mall, but its neighbors.
- B-007-009** Access to the Mall, particularly to and from I-5 and particularly on the western side, are the most important elements of the Mall's customers' means to reach the Mall and the adjacent freeway interchange that serves the larger Northgate Neighborhood and business district. Peak directional flows at this interchange system operate at or near capacity during peak weekday and weekend periods. This interchange also serves as the first access/last terminus for local connection onto the reversible I-5 Express Lanes. As a result, added pressure onto local arterials is generated along 1st Avenue NE, 103rd Avenue NE, and NE Northgate Way. Moreover, regular freeway congestion along the I-5 corridor occurs on a consistent basis, and regional traffic spillover already regularly utilizes these arterials that serve as the primary Mall access. A recent collision at the I-5 northbound off ramp that closed a single lane on 1st Avenue NE indirectly sent traffic for hours "through Mall property", essentially stopping and blocking traffic flow within the Mall interior drive aisles for hours as drivers diverted around congested roadways.
- The Mall's primary trade area of regular shoppers (from which 70% of its retailers' sales are generated) extends south as far as Lake Union and Westlake, and north to the King County/Snohomish County Line. The Northgate/I-5 off-ramp is the Mall's primary point of customer access for a significant majority of those customers coming northbound, given the already bottlenecked conditions at the Northgate Way/I-5 underpass, and the lack of any significant east-west routes over/under I-5 to the south.

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B-007-008

This specific proposal is not an element of the Lynnwood Link Extension. Responses above address Sound Transit's approach and commitments to coordination construction period planning that would occur regardless of details of any of the other projects or activities in the area.

B-007-009

Sound Transit recognizes the importance of the I-5 ramps and 1st Avenue as access points for the Northgate District as well as for the mall and its patrons. The Draft and Final EIS and the Transportation Technical Report all indicate the Northgate/I-5 off-ramp experiences high levels of congestion and delays, and predict increasing levels of congestion through 2035. The continued congestion on major highways and local streets is among the reasons light rail is to be developed in this area, particularly as the Northgate District continues to absorb growth and development as a regional growth center defined in regional and city plans.

B-007-010 Construction impacts are not just related to interruption or alteration of existing roadways, access or circulation. One also needs to factor in the construction activities, and the vehicles/equipment used for construction, and their added burden to the adjacent roadway network. The DEIS does not provide any information regarding the size or timeframe of the proposed construction staging nor the duration and intensity of use of the truck haul routes to and from the Mall, so from the existing DEIS it is not possible to meaningfully understand the extent of these impacts. The DEIS also fails to analyze the cumulative impacts of the foregoing when combined with the Northgate Link station and guideway construction and construction of the park-and-ride garage, nor for the potential construction of King County's TOD plans immediately to the south of the Mall. Currently, the Sound Transit/Metro garage is proposed for construction in or around 2014/2015, the Northgate Station construction staging is proposed to occur from 2016 to 2019 on the Mall site, and the Lynnwood Link construction is proposed to occur from 2018-2023. The potential timing of the King County TOD is unclear, but representations have been made that suggest several hundred units might possibly be complete by the time Northgate Station is open. If not coordinated, continuous and possibly conflicting construction on the Mall site could occur from 2014 through 2023, a 10-year period, impacting vehicular/pedestrian access, freeway interchanges, and parking facilities and availability for both the Mall and its neighbors. The Mall requests that a focused comprehensive study of these issues be undertaken to ensure that traffic circulation is maintained, public or TOD parking impacts do not occur, and economic impacts to Mall tenants and their employees are minimized as a result of these cumulative impacts expected to result.

B-007-012 It is important to understand that for regional destinations such as Northgate, long-term, burdensome conditions are likely to permanently divert customers to alternatives. Getting these customers to come back once the public infrastructure projects are completed is not only not guaranteed, for many it is likely to permanently alter their shopping patterns. This phenomenon is well documented across America. Once a customer is alienated for any period, it is difficult to lure them back. The ability to keep the Mall occupied with quality retailers and dining options, as well as to maintain the quality and vibrancy of the Mall as a regional center, depends on that convenient and continuous access and availability of parking as they are currently accustomed to.

B-007-013 Sound Transit's FEIS should provide additional information and analysis of these issues, along with carefully considered alternatives for minimizing impacts that could permanently shift customer shopping patterns away from Northgate, given the duration of the combined impacts for the Projects, and their cumulative overlapping activities. Sound Transit should analyze how timing and coordination of construction for the Northgate Link and the Lynnwood Link can minimize impacts to the Mall, especially recognizing the potential TOD overlapping concerns.

III. Impacts to Mall Parking and Circulation.

B-007-014 As noted above, Sound Transit is proposing to use the parking lot on the western side of the Mall for construction staging for the Northgate Link. Given constraints on 1st Ave up to Northgate Way, it is reasonable to assume continued desire on Sound Transit's part to use of some Mall property for this purpose beyond the North Link project's construction timeframe. Moreover,

87429-0001/LEGAL27850949.3

B-007-010

The Lynnwood Link Extension's Northgate area construction activities will primarily involve the construction of the elevated guideway. Therefore, the duration and intensity of the construction activities are expected to be about a year, less than what is needed for the Northgate Link Extension, which involves a tunnel portal, guideways, the station, the parking garage, guideways and tailtracks. Truck traffic to serve construction activities would also be less, with less need for spoils removal or fill, fewer materials, and fewer crossings of existing streets and roadways. The Draft EIS had a summary of activities, but deferred discussion of specific details to the Transportation Technical Report, which identified the types of activities including potential night-time periodic closures in the Northgate area on pages 6-10 to 6-19. Additional discussion is now included in the Final EIS in Chapter 3, and updated information is in the Transportation Technical Report.

B-007-011

Using the general construction and project development period for the Lynnwood Link Extension (or the Northgate Link Extension) does not accurately reflect the duration of construction activities with the potential for higher construction period traffic impacts. As page 2-27 of the Draft EIS notes, in any given location, heavy civil construction is expected to be completed within one to two years. Construction of elevated sections of the guideway would be staged to minimize major traffic impacts, with most closures or detours occurring at night. Depending on a contractor's approach to staging, the guideway segment could be placed within 3 months of relatively continuous work, or 6 to 12 months of intermittent work. Therefore, there is not a high potential for the Lynnwood Link Extension to create higher cumulative construction effects than those already identified for the projects individually, and a continuous ten or more years of heavy construction adversely affecting access to the Northgate area is not expected considering the projects in the area. The Transportation Technical Report gives further detail on likely sequencing

B-007-014 Sound Transit is proposing to permanently take the parking area on the southwest corner of the Mall site to build a Sound Transit/Metro garage. The DEIS does not include sufficient information to understand the scope of the parking impacts from the Lynnwood Link construction staging, nor the cumulative impacts of the Northgate Link, Lynnwood Link and Metro TOD plans.

Additional information and analysis should be provided, along with alternatives for minimizing parking and circulation impacts. In particular, as discussed above, Sound Transit should analyze how timing and coordination of construction for the Northgate Link and the Lynnwood Link can minimize impacts to the Mall, factoring in realistic assumptions for King County's TOD prospects.

IV. Hide and Ride.

B-007-015 Currently, the King County-Metro transit center is located south of NE 103rd Street, immediately south of the Mall. Surface and structured parking is heavily used in close proximity to this facility, as commuters limit their parking desire to the shortest walking distance. Relocation and expansion of the major transit access points further north to include the Mall and adjacent property will significantly increase the likelihood of commuters using the private surface parking lots of the Mall for "hide-and-ride".¹ This happens routinely in Simon centers, including at its Stoneridge Mall in Pleasanton with the new BART station (completed 2011) abutting that mall. With added pressure during construction of the Northgate Station, the proposed Sound Transit parking garage, extension of Link north along 1st Avenue NE, and King County TOD all generating additional demand or displacing existing supply within the Mall, and with new demand generated by Lynnwood Link trips, parking demand impacts on the Mall should be considered in a cumulative and comprehensive manner. During each stage of construction, upon completion of the Northgate Station and line but prior to Lynnwood being operational, and thence forward.

Given understating of parking demands during the critical construction period windows (when Sound Transit currently anticipates reducing the Mall parking supply for many years to build facilities on and adjacent to Mall property), and perhaps most acutely once Northgate Station is open, but the Lynnwood extension is not complete, several years of continuous loss of parking is likely to affect Mall retailers' ability to be successful absent mitigation of impacts to what is already a very tight parking arrangement at Northgate Mall. The Mall is at the low end of parking requirements for regional malls in suburban settings. The Mall and its tenants cannot afford for inadequate commuter parking to make what is already going to be a challenging

¹ In addition to "hide and ride" parking, similar activity and impacts to the Mall result from other public facilities located nearby. For example, on August 20, 2013, from 5:30 pm - 8:00 pm, Sound Transit held an open house/public hearing on the DEIS at the Northgate Community Center Gymnasium at 10510 5th Ave NE, Seattle (corner of 105th and 5th Ave. NE, adjacent to Northgate Mall). The lot was full before the meeting started. Therefore, members of the public who did not simply give up in frustration parked in the private Mall parking lot closest to the community center to reach the open house meeting, or in the residential neighborhood to the south.

by area to help support the finding that construction impacts can be managed to avoid severe impacts.

As noted above, Sound Transit's construction period mitigation commitments will include coordinating planning with other projects as well as with stakeholders, the City and WSDOT, which would further reduce potential construction impacts for individual projects as well as potential cumulative or sequential projects. As part of final design for the Northgate Link Extension, Sound Transit has continued to develop details of the construction sequencing and phasing.

B-007-012

Sound Transit recognizes the concerns of the Mall in retaining its customer base. The construction planning and mitigation approach for the project includes a commitment to maintain effective access to the mall and to parking to reduce the potential for impacts to the long term customer base of the mall. In addition, the long-term presence of the light rail line near the mall and the high visibility and accessibility of the mall for Sound Transit riders has the potential to attract customers to the mall.

Measures identified in Section 4.3.6 (Economic Impact Mitigation) of the Final EIS describes communication, marketing and promotional measures Sound Transit would implement with businesses and business districts to minimize impacts. This would include working with Simon Properties to publicize that businesses are open during construction, and to develop signage and wayfinding systems for the construction period.

B-007-013

The Final EIS includes additional discussion clarifying the areas of potential construction overlap with the other projects noted in your letter, and also has further detail on the types of construction activities by location for the Lynnwood Link Extension. However, many of the

B-007-015 situation worse. Yet, these unmitigated public spill-over public parking impacts are going to occur for a number of years as these overlapping Projects proceed. Simon and its retailers are highly motivated to help Sound Transit make sure they do not experience the negative consequences that Simon tenants in other “transit project-proximate” locations already experienced elsewhere. And one can look at the current conditions, where commuters fill up virtually all of the close park-and-ride lots, and then park on Mall property, and fill up most of the surface streets surrounding the existing Northgate Transit Center most weekdays, to know that significant anticipated increases in utilization of public transit here will undoubtedly not result in reduced parking demand. It is incumbent upon Sound Transit’s environmental analysis to compare current “boardings” of transit systems to anticipated future boardings, identify how many of those incremental boardings are likely to come from automobiles, and properly plan to accommodate them without burdening the Mall and surrounding streets and neighborhoods. This needs to be looked at for each step in the process of transitioning the area surrounding Northgate Station, up until Lynnwood is open and operating, and relieving this community of the likely peak parking demand as the end node of the system until that new link is open and operational.

V. Impacts to Visibility from I-5.

B-007-016 The Northgate Station, the Northgate and Lynnwood guideway, and the Sound Transit garage will all impact visibility of the Mall from I-5 and to some degree 1st Avenue NE. The DEIS states that “Views of Northgate Mall from I-5 would not be impaired.” DEIS at Table 4.5-1 (Summary of Potential Visual Quality Impacts of the Light Rail Alternatives). That statement is factually incorrect, particularly when considering the cumulative visibility impacts of the Lynnwood Link, the Northgate Station and Link, the proposal for a Sound Transit/Metro garage on the southwest corner of the Mall site, and the King County Northgate TOD plans. The DEIS should correct this inaccuracy and analyze and address how visibility impacts might be minimized, such as by providing temporary or new permanent replacement signage for the Mall, or otherwise compensating for such impacts. Though Northgate Mall generates a good deal of business from the local community, the reality is Northgate Mall, as with most shopping malls of this kind, generates customer traffic primarily from a much broader clientele. In the Mall’s case via the freeway system up to the King County line, and as far down as U Village and Westlake. The Mall’s trade area of regular shoppers has a population base of close to 500,000 people. And thus visibility and awareness from that broad audience is critical to the Mall retailers’ success.

VI. Traffic Impacts on Roads and Arterials Surrounding the Mall.

B-007-017 The DEIS Transportation Technical Report (July 2013) recognizes that arterial and local street impacts would be highest at stations that provide the greatest number of park-and-ride access opportunities. This review however, does not consider the impacts (increase or decrease) in those specific types of traffic impacts relative to the Northgate Link station area, nor the cumulative impacts that could very likely be experienced with overlapping construction activities. As noted above, these specific impacts should be included in a “focused” Northgate Station Area Traffic and Parking Impact Study. This study would address short-term,

87429-0001/LEGAL27850949.3

mitigation measures already defined in the Draft EIS and that now accompany the Preferred Alternative in the Final EIS are designed to address the stated concerns over construction and potential impacts to business and economic activity in the Northgate district. This includes a commitment to coordinate construction planning and mitigation with other projects.

B-007-014

Northgate Link Extension has been discussing with Simon Properties the use of the southwest corner of the Mall site for construction staging and guideway construction. Impacts related to displaced parking supply are being addressed by Sound Transit as part of the Northgate Link Extension.

Figure 6-1 of the Transportation Technical Report indicated a construction staging area in the mall lot based on preliminary plans; the Final EIS has updated conceptual design plans for construction staging, which supercedes the figures that were used in the technical report, but still shows the edge of the property being potentially used. Construction staging planning is still in early stages, and the areas to be used would depend on final design details as well as property availability, including both public and private properties. The Draft EIS for the Lynnwood Link Extension identified the mall property as being affected by partial acquisition in Section 4.1, Acquisitions, and Appendix I-4.1, and includes conceptual plans in Appendix F that show the potential for parking stalls on the far west edge of the lot to be impacted in order to construct structural supports for the guideway as it crosses to the west side of 1st Avenue NE. The Final EIS updates that information for the Preferred Alternative. The number of potentially affected spaces is small (less than 20) compared to the overall supply available at the mall, and the EIS identifies measures to mitigate any loss of parking on private property (primarily compensation when the amount of displaced parking is small).

B-007-017 intermediate, and long-term traffic and parking impacts to the Mall and the I-5 Northgate area freeway interchange system and local arterial system. This type of study will be especially vital in the evaluation of construction impacts, that include construction staging, Mall access closures, temporary parking impacts, etc. And it should be able to help identify upfront traffic mitigation efforts that can partially mitigate for the impacts during years of construction, before the area is finally free from construction related impacts in the 2021 thru 2024 years, as best as the Mall can foresee. Anticipated TOD densities and timing will also need to be factored into the analysis.

VII. Alternatives.

B-007-018 The DEIS also fails to take a hard, fair look at reasonable alternatives. Given the direct, indirect and cumulative, and enduring, adverse environmental impacts the light rail and TOD plans would create, this analysis should not be piecemealed, but rather should carefully assess impacts and alternatives across all of these "segments" of Sound Transit's proposal.

B-007-019

- Sound Transit currently plans to condemn a portion of the Mall land, and to construct the replacement parking for the King County Metro park-and-ride patrons in a parking structure on the Mall's property. Given the burdens the Mall and its retailers and customers are already going to shoulder for a decade during coincident construction of rail facilities, the multi-modal transit station and the TOD project contemplated, the Mall recommends that Sound Transit reconsider, and fully analyze, the placement of the Northgate park-and-ride facility on the King County Metro TOD site (similar to the preferred alternative in the Northgate FEIS (2006)). Simon further recommends that such an alternative consider the scope and timing of the otherwise intensive TOD project (and coordinate Sound Transit plans with Mall plans to build its own garage to mitigate the Projects' parking impacts during Sound Transit's construction staging on the Mall site).

B-007-020

- The Mall recognizes that its site will be used as laydown for construction staging for the Northgate extension project, but it is not clear if that "need" extends further into the future with the proposed Lynnwood project. Given the tight physical constraints between I-5 and 1st Street as one approaches a heavily congested Northgate Way interchange, the Mall and its tenants would like to understand whether Sound Transit anticipates using the Mall further for additional laydown as part of the construction of the Lynnwood Extension. In that regard, Simon's representatives were advised that that was a distinct possibility during Sound Transit's Northgate open house. Simon requests that the need, scope and extent of any additional laydown be clarified and analyzed.

B-007-021

- For the long term, it is clear that moving the planned park-and-ride garage to the current Transit Center site would reduce traffic impacts/conflicts with the 500,000 person population in the Mall trade area that is driving to Northgate to shop, and result in less pressure for "hide and ride" that would impact the Mall's available parking for Mall patrons, as well as its retailers success and its neighbors' parking options and residential neighborhood ambiance.

87429-0001/LEGAL27850949.3

B-007-015

The Northgate Link Extension project is proposing the use of the southwest corner of the mall parking lot, and impacts related to displaced parking supply as well as the potential for managing potential hide-and-ride effects, are being addressed by Sound Transit as part of that project, consistent with the North Link Final SEIS and that project's Record of Decision. The Final EIS and the Transportation Technical Report for the Lynnwood Link Extension have further detail about construction staging and sequencing in the Northgate area, and describe both the types of activities, the timing, and the nature of construction staging areas, which are generally west of 1st Avenue. In addition, the Transportation Technical Report and Chapter 3 of the Final EIS both indicate that ridership at the Northgate Station would be lower after the Lynnwood Link Extension opens, which would reduce the potential for transit-related traffic and parking impacts around the Northgate station.

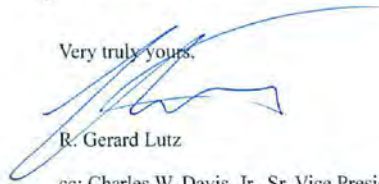
B-007-016

The conclusions in the Draft EIS, with the visual simulation in Figure G-3, shows that views would not be impaired because the prominent buildings within the mall would continue to be visible above the elevated guideway. The elevation of I-5 slopes down from south to north from an elevation of about 310 feet at NE 92nd Street to an elevation of about 270 feet at NE 100th Street and continues at that level until it begins to climb again at about 310 feet at Northgate Way. The buildings of the Northgate Mall are at an elevation of about 300 feet. Parking lots slope to the west and south to about 280 feet. Vegetation along I-5 and the canopy of trees in the parking areas screen the lower portions of the mall buildings from most of I-5, however the mall is still a prominent landmark because of the visibility of upper floors of buildings. The light rail guideway is generally at an elevation of 325 feet. As shown in Figure G-3 (at about NE 97th at an I-5 elevation of about 284 feet) the guideway obscures the lower elevations of buildings. The upper portions of buildings and the general presence of the features of the mall are still

Conclusion

B-007-022 For the foregoing reasons, Simon requests that the FEIS fully assess the cumulative impacts and effects of the North Link, the Lynnwood Link, and the King County TOD proposal, particularly in light of the existing infrastructure deficiencies in the area around the Mall. When viewed together, it is clear that the impacts to the Mall and its neighbors will be substantial during the extended 10+ year construction period, and that the final result will be dramatic parking and traffic impacts, and associated damage to the economic vibrancy of the Mall and its business neighbors, as well as the livability of the Mall's neighboring residential areas. We look forward to working with Sound Transit (and King County) staff to help avoid, reduce and mitigate these impacts, with the goal of helping to make the North Link and Lynnwood Link the successes the public is hoping for.

Very truly yours,



R. Gerard Lutz

cc: Charles W. Davis, Jr., Sr. Vice President Development - West, Simon Property Group

clearly visible. As I-5 slopes downward to the north, views of mall from northbound traffic are increasingly obscured by retained vegetation along I-5 and tree canopy in parking lots. Southbound traffic north of Northgate Way has few views of the mall because the roadway curves to the east and views from vehicles are oriented to the southwest. South of Northgate Way, views of the mall are out of the line of sight of drivers. Passengers can see major features of the mall by looking sideways. The elevated portions of the light rail guideway rise from an elevation of about 310 feet to about 325 feet between 107th Street and Northgate Way and are above the level of the base of the mall, but is still below the level of the tree canopy in the mall parking lots. The upper levels of buildings are still visible. Occupants of vehicles on I-5 have extensive views of complex urban development on both sides of I-5 and of the upper portions of buildings, including the mall. The presence of the mall and other development remains the dominant feature in views from the road. The portion of the guideway shown in Figure G-3 is part of the Northgate Link Extension south of the current project, and therefore illustrates the cumulative impacts of both projects. This figure also shows the existing parking structures. Proposed station impacts were analyzed in the Sound Transit North Link Final EIS on pages 4-54 and are illustrated in Appendix P4.4 View Location 1.

B-007-017

As noted in responses above, the Final EIS and the Transportation Technical Report provide more detail on construction and how the Lynnwood Link Extension would reduce the demand for transit-related trips at the Northgate Station, compared to No Build. Therefore, a detailed assessment of traffic conditions in Northgate, in addition to the more detailed analysis conducted for the Northgate Link Extension would not be needed to confirm that the Lynnwood Link Extension would not increase traffic impacts compared to the Northgate Extension alone.

B-007-018

The alternatives in the Lynnwood Link Extension EIS assess the potential impacts of a project defined as providing an extension of mass transit from Northgate to Lynnwood. The Northgate Link Extension and the Lynnwood Link Extension are separate projects, with the Northgate Link Extension being part of previous decisions, environmental reviews and funding commitments that have allowed the Central Link system to be built for the corridor connecting SeaTac to Northgate. Potential refinements to the Northgate Link Extension are not being considered as part of the Lynnwood Link Extension. However, as Sound Transit continues to complete final design for the terminus of the Northgate Link Extension, the agency is coordinating with Simon Properties, the City, King County Metro and others to address the concerns that your letter identifies.

In addition, the Lynnwood Link Extension EIS identifies actions that are related to the connections between other projects as indirect, secondary or cumulative. In this way, Sound Transit has evaluated the potential for significant environmental impacts arising as a result of the Lynnwood Link Extension, whether it arises directly from the project or whether it would occur as part of other reasonably foreseeable activities in the area. This discussion is found in the Final EIS in Chapter 4 for each resource evaluated, and mitigation measures to address cumulative effects are identified in the Final EIS.

B-007-019

For the Northgate Extension, Sound Transit has coordinated the project's final design planning with Simon Property Group and King County Metro to confirm the location of the park and ride facility at Northgate Station. The areas that were considered would not be directly affected by the construction of alternatives being considered for the Lynnwood Link Extension. Sound Transit has also entered discussions with Simon Property Group about the use of an area within the west part of the mall

parking for construction staging for the guideway north of the Northgate Station. Depending on the final outcome of those discussions and negotiations, the Lynnwood Link Extension could propose using this area for construction staging.

B-007-020

Sound Transit generally plans to maintain construction staging along the Segment A alignment within the proposed guideway, stations, and other available rights-of-way. Properties proposed for permanent acquisition or that are available for lease are also often considered for construction staging. Appendix F of the Final EIS updates the areas that Sound Transit expects to utilize for construction activities, which includes the western edge of the parking lot to the mall where the guideway would begin before crossing over to the west side of 1st Avenue. As you know, Sound Transit has been in discussions with Simon Properties for this area as part of the Northgate project as well. As part of coordinating construction for both projects, Sound Transit is also considering opportunities to combine some aspects of construction of the projects into a single construction period to help reduce overall impacts.

B-007-021

This issue is related to the Northgate Link Extension and King County's Transit-Oriented Development project, and is not related to the decisions being made for the Lynnwood Link Extension.

B-007-022

In the Final EIS and in responses to this letter's individual comments, Sound Transit has added further information describing the relationship between the Lynnwood Link Extension to Northgate Link Extension, and the King County TOD project. This includes further information showing that the potential combined construction periods would not involve more

than 10 years of intensive activities that would not be addressed by mitigation measures already in place in the Lynnwood Link Extension and North Link EIS documents, that the Lynnwood Link Extension would have a more limited range and duration of construction activities, generally north and west of the mall property, and also demonstrating that the Lynnwood Link Extension would reduce the potential for long term traffic and parking impacts in the district.

Sound Transit remains committed to working with Simon Properties, the City of Seattle, King County and others as final design and construction continues on Northgate Link Extension, and as the County ultimately advances its TOD project.

From: Mike Raskin <Mike@mjrdevelopment.com>
Sent: Sunday, September 22, 2013 9:59 PM
To: Lynnwood Link DEIS
Cc: Mike Raskin
Subject: Lynnwood Link Extension Comments
Attachments: Site_N - Labeled pdf.pdf; Building Photo.jpg.jpg

September 21, 2013

Re: Sound Transit – Lynnwood Link Extension

Dear Sound Transit

I would like to provide my thoughts and comments about the proposed options for the Lynnwood Link. It is my sincere hope that Sound Transit will support Option C-3 or the newly proposed Option C-4 as opposed to Options C-1 or C-2.

B-008-001 I am the owner of a three story office 72,000 s.f. Class “A” office building located on 20311 52nd Avenue in Lynnwood, just north of the Edmonds School District Property. I also own two other adjacent properties and have plans on those properties for an additional 50,000 s.f. of office to be developed in the near future. I have attached a map showing the location of the building and a picture showing the building.

My building is leased to the State of Washington and houses a number of agencies including DSHS (Department of Social and Health Services) and DCFS (Department of Children and Family Services) that provide valuable services to the Lynnwood and South Snohomish County communities. Many of the roughly 250 people that work in the building live in the Lynnwood area and they, and the many visitors to the building, shop at local Lynnwood businesses during their work week. If Route C-1 or C-2 is chosen it will negatively impact valuable community services both during and after construction as well as have a negative effect on local Lynnwood businesses. These people and their many clients in the community will suffer. If C-1 or C-2 is chosen it will hurt important State services and the effect on the buildings and plans for the property will be significant.

If C-1 or C-2 is selected homes and businesses will be destroyed, parks and pristine wetlands will be damaged, companies and residents will be displaced. There will be significant negative effects on the environment including water, air, soil, parklands, noise, ecosystems, vegetation and wildlife. The construction alone will take years in which time the entire area which is residential as well as commercial will be effected. How can that make sense when other options closer to Interstate Five with lower impacts on residents and business are available. I would also be surprised if options C-1 and C-2 are not far more expensive than either C-3 or C-4. I know that Sound Transit provides estimates of the impact of each option to the City and Community but do these studies include the possible economic loss to Lynnwood’s businesses if tenants move away and businesses are forced to close from options C-1 and C-2. I would hope that Sound Transit will consider these ramifications before making its choice.

B-008-002 It appears that the Lynnwood City Council has in the past favored option C-1 as opposed to option C-3. Staff reports present that the C-1 alignment “might be” more favorable for the proposed City Center project than the C-3 alignment. If the City Center project happens it will likely be many, many years from

1

B-008-001

Thank you for identifying your concerns about your building and the potential impacts to businesses and operations it houses, as well as to other residences, businesses, and employees along the Alternatives C1 and C2 alignments. While these alternatives would acquire properties and displace businesses and operations, requiring their relocation, the mitigation measures identified in Section 4.1 (Acquisitions, Displacements and Relocations), as well as in Section 4.3 (Economics), would offset many of the impacts. Sound Transit would also work closely with tenants, including any affected service agencies, to ensure that their services would continue to be available during any relocation process. While these and other mitigation measures are available for those alternatives to reduce impacts, some impacts would be unavoidable, and the alternatives indeed vary in terms of which properties and parties would be affected. Still, larger scale impacts to the overall area are not likely, because access to the surrounding area and properties would be maintained throughout construction.

Following the Draft EIS, Sound Transit received a considerable number of other comments voicing similar concerns about Alternatives C1 and C2. The Sound Transit Board has identified a modified Alternative C3 as the Preferred Alternative in the Final EIS. If this alternative is selected for construction, then the property impacts along 52nd Avenue W would be avoided. Again, the Draft EIS and the Final EIS both identify mitigation measures to help reduce the severity of the impacts, and some of the areas of impact that are noted in your comment (water, air, soil, vegetation, and wildlife, for example) would not result in adverse effects to the environment after mitigation has been applied.

B-008-002

The Final EIS provides cost estimate comparisons for all the alternatives in Chapter 5. The Segment C alternatives have similar cost ranges. The Draft EIS and Final EIS do not analyze an Alternative C4, but the Final

B-008-003

now. Locating the Lynnwood Link at locations C-1 or C-2 will cause real harm to the City now. It seems shocking that responsible City leaders could choose to impact a significant number of residents, citizens and businesses now for some potential uncertain gain that "might" occur many years from now. I would hope that Sound Transit would carefully look at any disadvantages of C-3. A case could be made that C-3 will make the City Center buildings more valuable since the elevated rail would provide visibility to the buildings in the City Center blocks effected in the same way as the Monorail does in downtown Seattle. Any potential future harm from C-3 is at best speculative, C-1 and C-2 on the other hand will cause real harm to the City now.

I am encouraged that the City of Lynnwood and Sound Transit is now considering a new option C-4. This option does not damage existing businesses and residences in the way that C-1 and C-2 does and it appears that the alignment might not affect the City Center Block in question. Selecting C-1 or C-2 will hurt Lynnwood, the community, valuable State services and the area in general. A choice of C-3 or C-4 makes sense and is good for the community.

Thank you for the opportunity to provide thoughts on this important decision.

Michael Raskin
President MJR Development
Manager – MR Creekside LLC

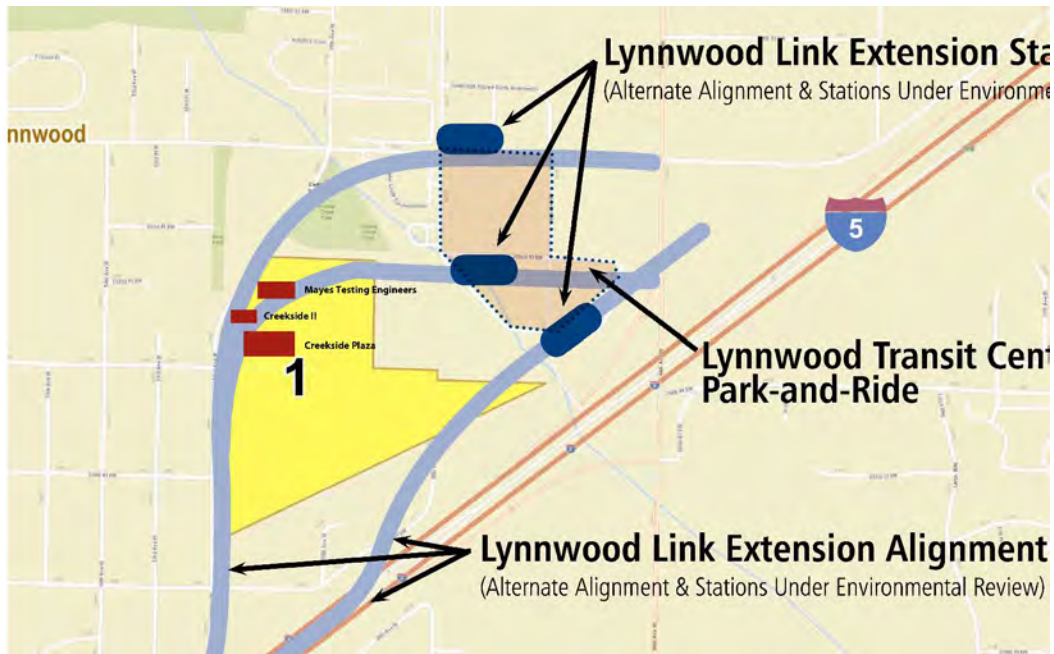


EIS does include a Modified Alternative C3, which is similar to an option proposed by the City of Lynnwood. As discussed in Section 4.3, Economics, of the Draft and Final EIS, Sound Transit does evaluate the economic effects of the alternatives, including loss of property tax revenue, and the section also considers the potential for other types of effects occurring during construction or operation.

B-008-003

Thank you for your comments regarding near-term conditions and impacts of the alternatives, compared to the longer range goals to develop Lynnwood's City Center area. Please see the Final EIS for updated analyses of the alternatives, including the modified Alternative C3.





From: Linda Willemarck <savescribercreekpark@yahoo.com>
Sent: Monday, August 12, 2013 10:08 AM
To: Lynnwood Link DEIS
Subject: Lynnwood Link - Scriber Creek Park - 875 Signatures anti Alternative C-1

----- Forwarded Message -----

From: Linda Willemarck <savescribercreekpark@yahoo.com>
To: Maryellen Walsh <tambosassy@gmail.com>; shoreline news <tips@shorelineareanews.com>; seattle times <mindblom@seattletimes.com>; News Tribune <rob.carson@thenewstribune.com>; Daniel Drais <daniel.drais@dot.gov>; Edmonds Beacon <edmondseditor@yourbeacon.net>; Mukilteo <mukilteoeditor@yourbeacon.net>; Snohomish <editor@snoho.com>; KOMO4 News <tips@komo4news.com>; Sierra Club <cascade_chapter@sierraclub.org>; "Fish & Wildlife" <director@dfw.wa.gov>; Habitat Program <habitatprogram@dfw.wa.gov>; Public Affairs <publicaffairs@dfw.wa.gov>; Team Mill Creek <TeamMillCreek@dfw.wa.gov>; DFW W <wildthing@dfw.wa.gov>; L Sordel <lsordel@ci.lynnwood.wa.us>; E Flesher <eflesher@ci.lynnwood.wa.us>; Lynnwood Today <lynnwoodtodayeditor@gmail.com>; Jim Smith <jimsmithcfi@msn.com>; Mike Gibson <Mike.Gibson@bankwithsterling.com>; P Robinson <PRObinson@BannerBank.com>; Larry Bowlandskate <larry@bowlandskate.com>; J Bloomquist <jbloomquist@nwttitleco.com>; Manager <northernlightsmanager@gmail.com>; Pam <Pam@BeBlessedRealty.com>; Jan <jan@groovieimpressions.com>; M Clark <mclark@scc.wa.gov>; Bill Knutsen <bill.knutsen@kingcd.org>; Snowberry <snowberry@gorge.net>; Kent Hale <kent.hale@soundtransit.org>; Executive <pcexecutive@co.pierce.wa.us>; Julia patterson <julia.patterson@kingcounty.gov>; C Balducci <cbalducci@bellevuewa.gov>; Richard Conlin <richard.conlin@seattle.gov>; Dave Earling <dave.earling@edmonds.wa.gov>; Mayor Redmond <mayor@redmond.gov>; Lynnwood WSDOT <lynnp@wsdot.wa.gov>; Marilyn Strickland <marilyn.strickland@cityoftacoma.org>; P Roberts <PROberts@ci.everett.wa.us>; Fred <fredb@ci.issaquah.wa.us>; Constantine <dow.constantine@kingcounty.gov>; Denslow <denslow@ci.sumner.wa.us>; Joe McDermott <joe.mcdermott@kingcounty.gov>; M Moss <mmoss@cityoflakewood.us>; Larry Phillips <larry.phillips@kingcounty.gov>; Pete Vonreichbauer <pete.vonreichbauer@kingcounty.gov>; S Roberts <sroberts@ci.lynnwood.wa.us>; Vaubuchon <vaubuchon@ci.lynnwood.wa.us>; C Boyer <cboyer@ci.lynnwood.wa.us>; K Lonergan <klonergan@ci.lynnwood.wa.us>; B Goodwin <bgoodwin@ci.lynnwood.wa.us>; Mark Smith <marksmith@ci.lynnwood.wa.us>; Albert Roberts <albert_roberts@hotmail.com>
Cc: Maryellen Walsh <tambosassy@gmail.com>; tallqleb@hotmail.com> <tallqleb@hotmail.com>; Julie Fielder <jmfielder27@yahoo.com>
Sent: Monday, August 12, 2013 10:03 AM
Subject: Lynnwood Link - Scriber Creek Park - 875 Signatures anti Alternative C-1

FYI: The following petition was signed this past week by 875 people. We will continue getting signatures through the September 23 deadline and will be present at every community meeting.

Petition

Save Scriber Creek Park – No on Alternative C-1

C-001-001

The signers of this petition are opposed to Alternative C-1 route for the Sound Transit Link Light Rail Lynnwood Extension because this alternative would have the most significant negative environmental impacts to Scriber Creek Park and its associated forested wetlands and wildlife habitat and quality of life of the residents in the area.

C-001-001

Sound Transit acknowledges your opposition to Alternative C1 due to its residential impacts and impacts to Scriber Creek Park and wetlands.

August 28, 2013

Pat McCarthy
Pierce County Executive
Sound Transit Board Administration
401 S. Jackson Street
Seattle, WA 98104

Dear Ms. McCarthy:

C-002-001 We are writing to you on behalf of the American Latvian Association Board of Directors and the 90,000 member strong US Latvian Community to express our deep concern regarding the news from Seattle Latvian Organizations that their historic Community Center is in jeopardy due to the Sound Transit plans of extending the Lynwood Link railway line.

C-002-002 The Seattle Latvian group is our largest member organization with several hundred active Latvian families, who utilize the property at 11710 3rd Avenue NE as the “epicenter” for ethnic activities. Regular Church services, Sunday school for children, ethnic celebrations and gatherings, Latvian choir and dance group rehearsals, as well as weddings and funerals take place there. It is one of the three largest and best organized Latvian centers on the West coast, in addition to Los Angeles and San Francisco.

ON A LARGER SCALE, it is not only the Latvian community that would be affected by the proposed transit line; the center is regularly used by Estonians, Lithuanians and even the students at the University of Washington Baltic Study program – the only such program in the United States.

HISTORICALLY, The center is of important cultural heritage and importance to Seattle area Latvians and Balts. When the Latvian refugees were admitted to the United States after the WWII, several hundred settled in the Seattle area. They organized, purchased land and built the first Latvian Center on Densmore Avenue North in 1955. Unfortunately, in 1969, the City of Seattle took the property for development of the Wallingford Playfield. Next year, the history may repeat itself – the second center, built by Latvian volunteers in the 1970s on the 3rd Avenue, is in danger of being expropriated.

The center is crucial for the continuation of Latvian and Baltic cultural, educational and religious activities, it has been visited by all the Baltic presidents, ambassadors and several government ministers, as well as US Senators and ambassadors. It is the home of:

(Over, please)

AMERICAN LATVIAN ASSOCIATION IN THE UNITED STATES, INC.

Tel: 301-340-1914

Fax: 301-340-8732

E-mail: alainfo@alausea.org

Internet: www.alausea.org

C-002-001

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.

C-002-002

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. Please see Section 2.5.1 for a description of the refined Segment A alternatives that avoid displacing the Church.

C-002-002

- Seattle Latvian Evangelical Lutheran Church, established in 1950
- Washington State Latvian Association, established in 1949
- Seattle Latvian School, established in 1950
- Latvian Folk dance group "Trejdieksmitis", established in 1962
- Seattle Latvian Choir
- Seattle Latvian Library
- Latvian student fraternities and sororities
- Latvian Seniors' club.

IN ADDITION, it is the place for one of the 15 polling centers in the United States organized by the Latvian government and the American Latvian Association for Seattle area Latvian citizens to cast their ballots in Latvia's National Elections.

Please keep Seattle diverse! Do not allow the proposed transit line destroy the Latvian Center! If we lose this site, we lose more than a building, and we fear that the local Latvian community will not have the means, manpower and moral strength to rebuild their center for the third time!

Sincerely,



Anita Batarags
President and Board Chair



Raits Eglitis
Secretary General



BELLEVUE SISTER CITIES ASSOCIATION
P.O. BOX 20012
BELLEVUE, WA 98009-0012

September 4, 2013

Sound Transit
Draft EOS Comments c/o Lauren Swift
401 S. Jackson St.
Seattle WA 98104

Re: Impact on Seattle Latvian Cultural Center

C-003-001

The Bellevue Sister Cities Association, Liepaja, Latvia Committee would like to add its concern to those questioning the present alternatives for the Lynnwood Link Extension DEIS and the serious impact it will have on further use of the Seattle Latvian Cultural Center.

The Seattle Latvian Cultural Center is a focal place, not only for those of Latvian background living in Seattle, but for all of us in the Pacific NW. The Latvian Association was a strong supporter back in 1992 when Liepaja, Latvia became one of Bellevue's sister cities, support that has continued throughout the past twenty years. The Latvian Cultural Center has been the venue for many of our social and informational as well as our fundraising events during this time. We are concerned that the present plans would greatly affect the use of this facility, a huge loss to us, as well as to the many other organizations that use it on a regular basis.

We hope that you will take this into consideration and provide for access to the Seattle Latvian Cultural Center so it can continue as a gathering place for the many people and organizations that presently use it.

Sincerely,

Inta B. Gotelli, BSCA treasurer
Liepaja Committee

cc. Hugh Burleson, BSCA president

C-003-001

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.

YAKO, JAPAN

HUALIEN, TAIWAN

LIEPAJA, LATVIA

CHANGUNG, CZECH REPUBLIC

Lynnwood Link Extension

Summer 2013



Draft EIS Comment Form

Submit your comments by September 23, 2013

NAME: Thornton Creek Alliance (TCA)
ADDRESS: P.O. Box 25690
CITY: Seattle STATE: WA ZIP CODE: 98165-1190
EMAIL ADDRESS: ruthalice@comcast.net
☒ Please sign me up for project email updates

Sound Transit wants to hear from you. Comments can be about anything related to the project, ranging from giving an opinion or observation to discussing technical aspects of the environmental analysis. The extended public comment period ends September 23, 2013. All comments received or postmarked by this date will be responded to in the Final EIS.

Comments

Please make TCA a party of record for all actions, ~~and~~ official communication, notice of meetings, etc for Lynnwood Link Extension Segment A



C-004-001

Sound Transit does not have a "party of record" designation for those interested in the project. However, Ruth Williams has been added to the project's email update list, per this written request.

C-004-001



*Honorary Consul of the Republic of Estonia
in Seattle, Washington*

September 11, 2013

Sound Transit
Draft EIS comments
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104

Dear Members of the Sound Transit Board,

C-005-001

I am writing to you in hopes of helping convey a strong message in support of preserving the Latvian Community Church and Meeting Hall located at 11710 – 3rd Ave. NE, Seattle, WA. It is my understanding that Sound Transit is considering possible routes through northeast Seattle which might impact the Latvian Hall.

C-005-002

As a member of the Seattle Estonian Community, the Latvian Hall represents as much of a “home” to our community as it does to Seattle-area Latvians as well as Lithuanians. As our community is smaller than the Latvian community, we have for decades rented the Latvian Hall as the centerpiece of our community meetings, holiday celebrations and cultural gatherings. The Latvian Hall has hosted visiting Estonian Presidents, members of Parliament and other dignitaries. It has also, on a personal note, naturally served as the site of my wedding in 2004, and hosted the funerals of my family members.

The Seattle Estonian community cherishes the Latvian Hall and our relationship with the Latvian and Lithuanian communities. The Latvian Hall is the foundation of that relationship and with its large auditorium, church and meeting rooms, it uniquely serves this purpose for our mutual use. The history we have shared over the decades within the walls of the Latvian Hall is immeasurable. During the Soviet occupation of the Baltic States, the Latvian Hall was a rallying place for legislative and political efforts in support of re-establishing independence in our homelands. Subsequent to the

9133 View Avenue NW
Seattle, Washington 98117

Phone: (206) 310-2153
Fax: (206) 284-4061

C-005-001

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.

C-005-002

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. Please see Section 2.5.1 of the Final EIS for a description of the refined Segment A alternatives that avoid displacing the church.



*Honorary Consul of the Republic of Estonia
in Seattle, Washington*

C-005-002

culmination of those efforts, the Latvian Hall continues to bind our communities through co-hosted community celebrations, fundraisers and commemorations.

I simply cannot imagine a vibrant Estonian, Latvian or Lithuanian community existing in Seattle without the Latvian Hall. I implore you to preserve this most important foundation of our shared community.

Most sincerely,

Paul A. Raidna
Honorary Consul
Republic of Estonia



9133 View Avenue NW
Seattle, Washington 98117

Phone: (206) 310-2153
Fax: (206) 284-4061

Handwritten signature: M. J. Smith

LATVIAN SENIORS' ASSOCIATION
6834 - 40TH AVENUE NE
SEATTLE WA 98115-7532

September 10, 2013

Draft EIS Comments
c/o Lauren Swift
401 Jackson Street
Seattle WA 98104

C-006-001

The 87 members of the Latvian Seniors' Association are deeply concerned that the proposed Lynnwood Link Extension may severely impact the Latvian Lutheran Church and Community Center buildings and access to them. Our organization has free use of the Community Center for its well-attended monthly meetings, which feature a substantial hot meal and a cultural program. We fear that any disruption of the availability of the facility, with its full kitchen and audio-visual support for presentations, will threaten the existence of our group due to lack of a convenient rent-free assembly place. This would constitute a severe emotional loss to our senior citizens.

Edvins Circenis
Edvins Circenis
President

Member signatures:

Handwritten signatures:
Dāvis Apinis
Ilana Cepstis
J. Butera
J. Butera
J. Jansevics
L. Riekstins
Jāta Vast
Alvise
Lente Pignau
Imarto Jimma
Rasua Jimma
Nalljapemmaris
Ike Kalnins
Juri Reldis
Roughs Copeland
Sillija Copeland

Handwritten signatures:
Herb Šamils Ligit Krags
Jānis Pārkule
Erika Kirsis
Lija Kūva
Valdis Hoderis
Lilija Sankalis
Jānis Sankalis
Valda Sankalis
Mirdza Abolits
Jānis Cilins
Lija T. O. Lige
Jānis A. Lige
Daina Alstojsh
Jānis Bēzins
Austra Bēzina
Anita un Voicets Uperietis

C-006-001

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. Please see Section 2.5.1 of the Final EIS for a description of the refined Segment A alternatives that avoid displacing the church.

North King County
MOBILITY COALITION

Mr. Perry Weinberg, Director
Office of Environmental Affairs and Sustainability
Sound Transit
401 South Jackson Street
Seattle, WA, 98104-2826

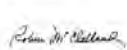




Dear Mr. Weinberg:

The North King County Mobility Coalition is comprised of agencies and individuals from North King County cities that share a concern for seniors, people with disabilities, youth, low-income households, and those with limited language skills who require access to public transportation. This letter is written to address their needs and concerns for the Lynnwood Link alternative.

- C-007-001** Generally thorough and well-written, the DEIS puts its focus primarily on the needs of able-bodied commuters. It is not clear how Sound Transit will make the stations accessible to people with limited mobility. Page 3-14 states that sidewalks will meet ADA requirements. How far from the stations this will apply? The Coalition urges Sound Transit to support actions that assure the necessary upgrades occur in coordination with the opening of the line.
- C-007-002** This may be complicated by the multi-jurisdictional ownership of NE 145th (WSDOT, the cities of Shoreline and Seattle, and King County) but the Coalition urges Sound Transit to work in collaboration with all owners to ensure that NE 145th meets the needs of nearby residents. Furthermore, the Coalition strongly supports better east/west transit connections for those who live in proximity, but not close enough to walk, to the LINK line. Our expectation is that Sound Transit will cooperate with Metro to make connecting buses interface well with the train.
- C-007-003** The Coalition supports the selection of a station at NE 145th due to the amount of housing for special needs populations within one mile of the proposed station. This includes many residential sites owned by the King County Housing Authority (such as Paramount House) as well as several other apartment complexes that serve veterans, seniors, and people with disabilities. A station at 155th would put the train out of reach for most of these residents. Therefore, the Coalition favors Alternatives with a station at NE 145th, including Alternatives A1, A3, A10, and A11.
- C-007-004** Finally, the Coalition is concerned that Sound Transit's public involvement efforts have not reached enough people with special transit needs. Page 4-63 states that the agency is obliged to reach out to people with limited access. However, the meetings described in the DEIS to discuss the Lynnwood extension seemed to have been oriented toward people with cars. In our experience, outreach to special needs communities is most effective when taken to the community rather than expecting the community to travel to a meeting space. Therefore, Sound Transit should plan for more community-based outreach, especially to special-needs populations.
- C-007-005** In summary, the Coalition recommends three actions moving forward: 1) the selection of the NE 145th station; 2) increased cooperation with other transportation agencies and concerned local governments; and, 3) greater outreach to and input from special needs communities.

Thank you for the opportunity to comment on the Lynnwood LINK DEIS.

Sincerely,

				
Robin McClelland	Dori Gilliam	James Seeks	Chris Eggen	Candace Ives
Coalition Member	Senior Services	Transportation Manager	Deputy Mayor	Resident Services Coordinator
		Northshore Senior Center	City of Shoreline	King County Housing Authority

14812 Main Street, Bellevue, WA 98007

C-007-001

Sound Transit will meet ADA standards for all of its facilities and projects, and a commitment for full access for all persons is an element of Sound Transit's adopted System Access Policy. Current designs for the project alternatives generally include new or rebuilt facilities to ADA standards for the station sites, to and from feeder bus stops and nearby intersections, and for any streets or other transportation facilities reconstructed or otherwise improved for the project. During final design, Sound Transit will also work with local jurisdictions on planning for access improvements for other facilities connecting to station areas.

C-007-002

Sound Transit will continue to work cooperatively with both Seattle and Shoreline to design a station that serves all users, including regional commuters and people coming to and from the surrounding neighborhoods. Sound Transit will coordinate with King County Metro to plan for changes in their transit service to support the station. Ultimately, route and service changes are determined by the local transit agency for the routes they operate.

C-007-003

Your preference for alternatives that include a station at NE 145th Street because it would be more easily accessible by those with special needs is noted.

C-007-004

As described in Chapter 6 Public Involvement and Agency Coordination, Sound Transit used a variety of outreach activities and methods to engage the community beginning at the early stage of alternatives analysis through the Draft EIS, and into identification of the Preferred Alternative and development of the Final EIS. For the Draft EIS, all of the sites for the public meetings were accessible by transit and were in

community facilities throughout the corridor. Activities and methods for public outreach included kiosks, community events, drop-in sessions, a project website, news media, fact sheets, brochures, newsletters, and an email subscription list.

C-007-005

Sound Transit will continue to coordinate with other transportation agencies, jurisdictions, and interested community organizations, including for people with special needs.



September 20, 2013

Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

RE: Lynnwood Link Extension DEIS Comments

Dear Ms. Swift,

Thank you for this opportunity to provide comments on the Lynnwood Link Extension Draft Environmental Impact Statement. I am writing on behalf of Futurewise, and our organization is a statewide public interest group working to promote healthy communities and cities while protecting farmland, forests and shorelines. Our Urban Program promotes a livable and sustainable region that can accommodate growth while providing necessary public amenities and a strong urban sense of place. Our primary objective is to promote policies for affordable, transit-oriented development in our region's urban centers and high-capacity transit areas.

We are excited about the Lynnwood extension as it will help provide convenient, reliable, economically and environmentally sustainable ways for our growing population to reach their jobs, homes and services.

Our overall priority to meet the goals of long term community health is to make station-area decisions that maximize the potential for ridership and meaningful Transit-Oriented Development (TOD). Successful TOD projects provide a rich array of amenities, housing and transportation choices in proximity to high-capacity transit. As a central strategy to accommodating growth *well* in our region, we believe this is critically important to system alignment and station siting decisions. Based on these priorities, our comments on the DEIS are as follows:

C-008-001

- We support Alternatives A10 or A11 for Segment A, with three stations at 130th, 145th and 185th. Maximizing potential ridership and long term TOD is the responsible decision for our regional growth. While TOD potential is currently less than optimal at the three station areas, we believe this will change over time and will be well worth the additional cost for the third station.
- Between NE 145th and NE 155th Street, we strongly support 145th due to greater proximity to a main thoroughfare, greater TOD potential, and better improvement options for accommodating multi-modal access to the station.

C-008-002

- Similar to Segment A, we support Alternative B2A in order to maximize our long term investment. The construction of two stations, Montlake Terrace Transit Center and 220th Street SW, will increase ridership and TOD potential.

C-008-001

Your preference for more stations, rather than fewer, is acknowledged. The Final EIS evaluates (as did the Draft EIS) three-station Alternatives A10 and A11. The Sound Transit Board will select the project to be built after the publication of the Final EIS. The Preferred Alternative includes the general alignment and stations of Alternative A1, and the Final EIS also reviews options for a future station at NE 130th Street.

C-008-002

In addition to Alternative B2A, the Final EIS evaluates the Preferred Alternative, as identified by the Sound Transit Board. The Sound Transit Board identified a modified Alternative B2 as the Preferred Alternative, which includes a station at the Mountlake Transit Center. The Sound Transit Board also directed further study of options to add a station at 220th Street SW or to make provisions for a future station at this location. Please see the Chapter 2 of the Final EIS for details.

C-008-003

- For Segment C, we are not comfortable providing support for any of the proposed alternatives, and encourage Sound Transit to explore a C-4 alternative. It is important for the station to be in close proximity to the existing transit center, and therefore we are not supportive of C3 for that reason.

C-008-004

- Multi-modal access to the stations should be a high priority for Sound Transit and it will be essential to accommodate all modes, including bus, bicycle, on foot and car. We are pleased with the System Access Policy recently approved by the Sound Transit Board to increase transit ridership through improved connections with local transit, paratransit, bicycle and pedestrian infrastructure, kiss-and-rides, and private vehicle parking.

C-008-005

- It is also critical to integrate safety, convenience and comfort into the design of all facilities and improvements serving the station areas. Having been involved with Shoreline's Public and Stakeholder Involvement Plan, we repeatedly heard concerns from community members about traffic, safety and ease of access. In addition, there was a common interest in community space being programmed into the station area to make it more integral and accessible to the surrounding neighborhoods.

Thank you for this opportunity to comment on the Draft EIS. We look forward to continuing to work with Sound Transit and the communities as the project evolves. Please contact us if we can provide any additional information.

Regards,



Monica Smith
Urban Policy Director
206.550.9725 cell

C-008-003

Following the publication of the Draft EIS, Sound Transit developed a modification of Alternative C3 for the Final EIS in collaboration with the City of Lynnwood, with the goals of improving transit integration, better opportunities for future development, and minimizing natural resource impacts. Alternative C3 Modified (as named in the Final EIS) includes moving the station closer to the transit center and is the Preferred Alternative.

C-008-004

Comment acknowledged. The Sound Transit System Access Policy is referred to in the Transportation mitigation section (Section 3.6.5) for nonmotorized transportation.

C-008-005

Sound Transit designs and maintains all of its stations to be safe, secure and clean, and station platforms include weather protection. The stations are well lit, have security cameras, and are regularly monitored by security personnel. The current conceptual plans for the stations include open areas, and Sound Transit policy encourages partnerships with other parties that indicate an interest in coordinated developments in station areas.



LITHUANIAN-AMERICAN COMMUNITY

WASHINGTON STATE CHAPTER
1019 NE 130th Street, Seattle, WA 98125-4069
(206) 282-9910 • lithseattle@hotmail.com

September 16, 2013

Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Sound Transit Board,

C-009-001

I am writing to express my concern regarding how the proposed light rail line will affect the Latvian Lutheran Church. The Latvian Center (the Church and its large hall) is used heavily not only by Latvian-Americans but Lithuanians and Estonians as well. Negative impacts must be minimized at all costs.

We Lithuanians do not have our own church, school or office buildings. We rely heavily on our brother Balts, the Latvians, to share their Latvian Center with us. Although over the last 40 years we have been "renters" and not "owners" of the facility, we have come to cherish it as our own.

The Lithuanian-American Community of Seattle has enjoyed the use of the Latvian Center for community celebrations and other events such as fundraisers for the Baltic Studies Program at the University of Washington.

The Latvian Center has been the site of folk dance practices and performances, concerts by local and visiting Lithuanian musicians, wedding receptions and memorial services. The hall has hosted visiting dignitaries such as Vytautas Landsbergis, the first head of state of newly independent Lithuania, Senator Maria Cantwell, Congressman Jim McDermott, two Lithuanian Ambassadors to the United States, and trade delegations from Lithuania.

We have gathered at the Center for these and many other community-centered commemorations, often in conjunction with our Baltic brothers and sisters (for example, the annual joint church service and commemoration of the deportations of Estonians, Latvians, and Lithuanians to Siberia). We have held educational lectures, fundraisers, and political meetings. And for decades during the Soviet occupation of the Baltics, the Latvian Hall was the gathering place for community activists working together on critical items related to re-establishing the independence of our three countries.

The Center, with its many organizations and activities, serves as our extended family, especially to those of us who immigrated to America without grandparents, uncles, aunts and cousins. Once torn, the rich social fabric of the Latvian Center may be irreparably compromised.

The Seattle Lithuanian-American Community feels very strongly that preserving the Latvian church and community hall in its present location, and keeping it open during construction, is of paramount importance not only to the Latvian community but to the Lithuanian and Estonian communities as well.

Rimas Miksys

President

Lithuanian-American Community, WA State Chapter

C-009-001

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. See Section 2.5.1 for how Sound Transit modified the design for all at-grade Segment A alternatives to avoid displacing the church. Chapters 3 and 4 provide more detail on how construction would be managed, with Section 4.4 providing more detail on how impacts would be mitigated to allow the church and center to remain open during construction.

1429 Avenue D, PMB 198
Snohomish, WA 98290



425-252-0926
www.pilchuckaudubon.org

September 20, 2013

Sound Transit DEIS
c/o Lauren Swift
401 S. Jackson Street
Seattle WA 98104

RE: Lynnwood Link Route Alignments

Dear Sir:

We are writing on behalf of the Pilchuck Audubon Society. Our organization has around 1200 members in Snohomish County and Camano Island. We advocate conservation and habitat preservation, especially as it relates to birds. We strongly support the benefits of light rail but do not want to see negative impacts on the natural environment due to siting issues.

Wild birds and other wildlife along the proposed light rail routes depend on many natural attributes of the ecosystem that encompasses (a) Scriber Park, (b) the much larger, non-park wetland that is connected with it, and (c) undeveloped upland areas (natural and semi-natural non-wetlands) that adjoin the park and wetland. Each of these land types provides habitat for wildlife to use for such essential activities as foraging, concealment from predators, visual isolation from competitors, daily and seasonal movement routes, or courtship display and nesting. In addition, juxtapositions of the land types are important in meeting such needs for certain forms of wildlife.

C-010-001 All presently proposed alternate light rail routes (C 1, C 2, and C 3, as well as the City of Lynnwood's "C 4") cross wetland and adjacent natural or semi-natural upland. These options would physically intrude upon and eliminate wildlife habitat and obstruct wildlife use in various ways. Associated problems for wildlife and for the vegetation they depend on would include (but not be restricted to) noise, unnatural shade, and pollution by falling material. These matters would adversely affect wetland wildlife, upland wildlife that must occasionally seek water, and wildlife that otherwise depend on the interfaces between wetland and upland. The "edge effect" of interfaces between habitat types is well known as important for some birds and other wild animals.

C-010-002 Route C 1 crosses less wetland (and probably less upland natural area) than the other present alternatives but intrudes on Scriber Park (EIS drawing C1M-PP02)¹. Therefore, it would detract from the park's function of bringing people into contact with nature and would degrade enjoyment of what many people seek in a natural park. We are also concerned about destruction and impairment of park land purchased with Conservation Future funds and intended to be protected in perpetuity.

¹ The drawings referred to exist in the Sound Transit 2 Plan's Draft EIS Appendix F, Part 3 ([http://www.soundtransit.org/Documents/pdf/projects/North Link/Lynnwood%20DEIS/201307_DraftEIS_09_Appendix_F_part3.pdf](http://www.soundtransit.org/Documents/pdf/projects/North%20Link/Lynnwood%20DEIS/201307_DraftEIS_09_Appendix_F_part3.pdf)).

C-010-001

Thank you for stating your groups' concerns about the alternatives crossing Scriber Creek wetlands. Most of the issues you raise are consistent with the Draft EIS discussions on pages 4-135 and 4-136, although falling materials and subsequent pollution are not predicted. During construction and operation, Sound Transit will abide by all applicable federal, state, and local environmental laws and regulations. Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on ecosystem mitigation is to avoid impacts on environmentally sensitive resources to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects.

C-010-002

Thank you for sharing your concerns regarding Scriber Creek Park. For what is now the Segment C Preferred Alternative, Sound Transit worked with the City of Lynnwood to develop a modified Alternative C3 that minimizes impacts to both Scriber Creek Park and the adjacent wetlands, while accomplishing other goals for the station site and its connection to the city center area. The Draft EIS identified potential impacts to the park with Alternatives C1 and C2 and identified potential mitigation for these impacts.

The Preferred Alternative does not require any property from the park. If Alternative C1 moved forward and required the use of Scriber Park property for the project, Sound Transit would seek approvals for conversion of property acquired using Conservation Futures funds, as well as mitigation for any impacts.

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C-010-002 Route C 2 would cross much more wetland than the other alternatives (EIS drawing C2M-PP03), and because it runs along the south boundary of Scriber Park, its physical presence and noise would degrade normal park functions of natural aesthetics and tranquility, as well as adversely affecting wildlife and their habitat in the adjacent part of the park.

The parts of Scriber Park from which either route C 1 or route C 2 could be seen or heard would be made distinctly unpleasant for visitors. Presence of major artificial structures, as well as the train noise involved, would detract immensely from the park's natural character and from human enjoyment of the park.

C-010-003 Route C 3 (EIS drawing C3M-PP02) crosses slightly more wetland than C 1 does, and it lies far from the park, but it would affect much more undeveloped upland than the others do and consequently would have a substantial negative impact on wildlife and their habitat.

C-010-004 Each of the proposed routes (C 1, C2, and C 3, as well as the City of Lynnwood's "C 4") would reduce resources needed by our wildlife and human community. Adverse effects of the increasing separation of humans from the natural world are of great concern to us. Accessible urban parks and open space help to counteract this "nature deficiency."

Consequently, Pilchuck Audubon recommends that Sound Transit design a "C 5" route superimposed on Highway I-5 for a further distance than C 3 does. It could then either (a) curve more or less northward (bending to the degree that C 1 does in approaching Scriber Park) in order to reach the Lynnwood Transit Center or (b) continue to Alderwood Mall.

Sincerely,

Kathleen Snyder, President

Ray White, Ph.D.
Member and Consulting Biologist

C-010-003

While it is true that Alternative C3 would affect more undeveloped upland than Alternative C1 or Alternative C2, the EIS analysis does not find these effects as having a substantially greater negative impact on wildlife and wildlife habitat than the other alternatives. As shown in Figure 4.8-1c of the Draft EIS, the upland areas crossed by Alternative C3 are dominated by maintained vegetation. This classification is consistent with the aerial imagery in drawing C3M-PP02 in Appendix F. As defined in the Draft EIS Table 4.8-2, maintained vegetation generally consists of exotic grasses or annuals such as mown grasses and other low vegetation. Such areas are unlikely to support abundant or diverse populations of wildlife. The guideway in that area would be elevated. As noted on the Draft EIS page 4-137, shading and other impacts on vegetation underneath elevated guideways at most locations would likely be minimal, as guideways 15 feet high or more would be able to support herbaceous plants and shrubs similar to those currently present.

C-010-004

Each of the proposed Segment C alternatives would impact resources used by either wildlife or humans, but to different degrees. Sound Transit appreciates your suggestion for the development of a fourth alternative that would be placed on I-5. The proposed alignment is not being considered further because an alignment along I-5 beyond where Alternative C3 crosses to the Lynnwood Transit Center has a higher potential to impact the Snohomish County PUD Substation and the existing direct access ramps, and is less able to balance impacts and benefits such as effective multimodal connections, minimizing walking distances to the transit center, retain/enhance TOD opportunities, minimizing wetland impacts, reducing property, displacement and economic impacts, and connecting to the future City Center. An array of alignment options were considered as Sound Transit considered modifications to Alternative C3.

From: Stefanie G <lebbonbird@yahoo.com>
Sent: Friday, September 13, 2013 8:33 AM
To: Lynnwood Link DEIS
Cc: rmarkle@shorelinewa.gov; Miranda Redinger; amcintire@shorelinewa.gov; dtarry@shorelinewa.gov; ceggen@shorelinewa.gov; kmcglashan@shorelinewa.gov; whall@shorelinewa.gov; dmccconnell@shorelinewa.gov; jsalomon@shorelinewa.gov; swinstead@shorelinewa.gov; Sowers, Nytasha; lwata, Roger
Subject: Lynnwood Link DEIS Comment - Ridgecrest Neighborhood Association
Attachments: Sound Transit Letter.docx

Sound Transit
DEIS Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

September 13, 2013

Ms. Swift,

My name is Stefanie Gendreau. I am the Chair for the Ridgecrest Neighborhood Association (RNA) Board of Directors. The largest single-family residence neighborhood in Shoreline, we border the east side of Interstate 5, from 145th to 175th NE.

I am submitting this letter of initial comments on behalf of the RNA Board of Directors and our residents. Even though this project will result in an unfortunate loss of homes for some of our residents, without a doubt, we are excited about Light Rail coming to Shoreline. Specifically we look forward to the development potential in the Ridgecrest Neighborhood and the availability of effective regional transit for our community.

Members of our board have been debating the station options as detailed in the D.E.I.S. for many months. Not unlike our residents, our board members are not unanimous regarding the preference of station at either 145th Street or 155th Street. However, our group is definitely leaning towards 155th Street as our station location of choice.

In general, we see the 155th Street option as a station with a neighborhood focus and the 145th Street option as a commuter-oriented station, that would primarily serve those driving to/from the station. The 155th Street station would better serve a larger population of residents in South Shoreline compared to a station placed on 145th Street, at the periphery of our population base. Also, 155th Street serves as a more effective east/west thoroughfare with existing bike lanes, a direct path to neighborhoods and businesses east of Aurora, and easy access to parks and businesses located on both 155th and 5th NE.

Regardless of the final station location, we are unanimous in what is important to the residents of the Ridgecrest Neighborhood. In regards to the station itself, some of the important points are;

- A smaller scale parking structure sufficient in capacity to minimize overflow parking on neighborhood streets but small enough to encourage bike, bus, and foot travel.
- Consideration of implementing "pay to park" for vehicles, again to encourage alternate methods of reaching the station.

C-011-001

Your thoughts on the potential NE 145th Street and NE 155th Street stations are appreciated. The Sound Transit Board identified the NE 145th Street Station as the Preferred Alternative. The Board will make a final decision selecting the project to be built after publication of the Final EIS.

C-011-002

Your recommendations regarding the capacity of the parking garage and potential charges for parking are noted. The stations along the alignment would provide balanced access for a variety of modes, including transit, walking, biking and, in several locations, parking, consistent with Sound Transit's System Access Policy. "Pay to Park" options are being considered by Sound Transit throughout its system.

C-011-001

C-011-002

C-011-003 |
C-011-004 |
C-011-005 |
C-011-006 |

- A structure that has adequate and safe facilities for bicycles (access, storage, etc.).
- An effective solution, including enhanced signal controls, for traffic flow on 155th with a clear plan regarding emergency vehicles exiting the Shoreline Fire Station.
- A station design that does not overpower the single-family neighborhood.
- Inclusion of a green space that could be used for neighborhood events and to offset the loss of a portion of Ridgecrest Park.
- The addition of mature trees and plantings to replace trees that will need to be removed and to help alleviate sound impacts.

Other points deemed essential to our residents include;

C-011-007 |
C-011-008 |
C-011-009 |
C-011-010 |

- The development of a robust sidewalk and biking network on both main and residential streets.
- An increase in street lighting and effective crosswalk signals.
- Effective noise mitigation, including the detailed study of sound that travels up the ridge, (hence our RIDGEcrest name) into the heart of our neighborhood.
- More frequent service by KC Metro during peak travel times, with a focus on an increase of east/west routes.
- Purposeful rezoning to encourage the development of multi-family structures that include potential for new business and will support redevelopment of the 5th/165th business area.

As the project moves forward, the Ridgecrest Neighborhood Association will continue to be part of the visioning process and will work within our neighborhood to be a conduit for information between our residents and both Sound Transit and the City of Shoreline.

We are both excited and optimistic that we can work together to create a successful segment of the Link light rail system through Shoreline that best serves City of Shoreline residents (more specifically Ridgecrest Neighborhood residents) and enhances regional mobility for all. Thank you for this opportunity to comment on the DEIS and convey our interests and preferences.

Sincerely,

Stefanie S. Gendreau

Ridgecrest Neighborhood Association

Chair - Board of Directors

stefanie@RidgecrestNeighborhood.info

cc-City of Shoreline Interim City Manager Debbie Tarry, Planning & Community Development Director Rachael Markle, Senior Planner-Transportation Alicia McIntire, Associate Planner Miranda Redinger, Mayor Keith McGlashan, Deputy Mayor Chris Eggen, Councilmember Will Hall, Councilmember Doris McConnell, Councilmember Chris Roberts, Councilmember Jesse Salomon, Councilmember Shari Winstead, Sound Transit Community Outreach Coordinators Roger Iwata and Nytasha Sowers

C-011-003

As described in *Chapter 2 Alternatives Considered*, Section 2.3, all stations would provide for effective pedestrian and bicycle access to and from nearby bus stops, park-and-ride facilities, and surrounding streets. Bicycle parking facilities would be provided. They would be designed to satisfy all applicable design standards, public access requirements, and fire, life and safety standards.

C-011-004

Design for the NE 155th Street Station would include accommodation for emergency vehicle priority and access to and along the arterial.

Potential traffic enhancements along NE 155th Street could include transit signal priority treatments at traffic signals.

C-011-005

If a NE 155th Street Station were to move forward as part of the project to be built, a range of architectural concepts would be explored during final design to minimize potential adverse effects of the new structures, noise walls, station area lighting, landscaping, and connections with local roadways.

C-011-006

In coordination with the City of Shoreline, Sound Transit has defined mitigation measures to offset the impact to a portion of Ridgecrest Park, including replacement of property for park areas converted to transportation use and installation of landscaping and a berm or barrier to provide visual screening. Trees do not typically offer notable sound reduction, but Sound Transit will work with WSDOT and Shoreline for tree replacement. Section 4.5 in the Final EIS discusses tree replacement.

C-011-007

All streets reconstructed with the project will meet local standards, which in Shoreline includes pedestrian and bicycle facilities as well as lighting and crosswalks. The Preferred Alternative plans have further details on these features, most of which are focused on the station areas and where streets are realigned for the project (near Ridgecrest Park and at the NE 145th Street and NE 185th Street Stations).

C-011-008

The noise and vibration impacts analysis considered topographical conditions in neighborhoods, including Ridgecrest, as described in Section 4.7 of the EIS and further detailed in the Noise and Vibration Technical Report. The Final EIS has updated information on potential noise impacts and mitigation, and Sound Transit's commitment is to mitigate all moderate to severe transit noise impacts in accordance to FTA standards.

C-011-009

The alternatives all assume an integrated transit service plan featuring local buses feeding the stations; for the EIS, Sound Transit worked with King County Metro and Community Transit to develop a conceptual plan, and east-west routes were prominent elements of the assumed network. King County Metro and Community Transit are ultimately the lead agencies for the actual service plans and any revisions, but their public planning for service revisions would be coordinated with Sound Transit, and typically occurs about a year prior to light rail project opening.

C-011-010

Thank you for your comment regarding rezoning to encourage higher-density mixed-use development. The rezoning of station areas, however, is not part of the Lynnwood Link Extension project. Rather,

revisions to land use plans and regulation is the responsibility of the local government. Section 4.2.4 Indirect and Secondary Impacts discusses these potential land use impacts in station areas. Rezoning in the Fifth Avenue NE and NE 165th Street business district would not likely occur, but could occur, as an indirect action related to the Lynnwood Link Extension project. Sound Transit is considering a light rail station at NE 155th Avenues, which is more than 0.5 mile from the district.



Seattle Latvian Ev. Lut. Draudze
Latvian Ev. Lutheran Congregation of Seattle

11710 3rd Ave NE
Seattle, WA 98125



Latviešu Biedrība Vašingtona Statā
The Latvian Association of the State of Washington

September 18, 2013

Sound Transit
Attn: Lauren Swift
401 Jackson Street
Seattle, WA 98104
LynwoodlinkDEIS@soundtransit.org

Re: Comments on the Sound Transit Lynwood Link Extension Draft Environmental Impact Statement Dated July 26, 2013, (the "DEIS")

To Whom It May Concern:

The Latvian Evangelical Lutheran Congregation of Seattle and the Latvian Association of the State of Washington jointly own and operate the church and community center building (the "Center") located at 11710 3rd Ave NE, Seattle, WA 98125 (the "Property"). This letter is written on behalf of our members and the multitude of people that regularly use our Center. We also write on behalf of the Estonian and Lithuanian communities in the Pacific Northwest who use the Center and share our deep concern with the alternatives Sound Transit has developed for the Lynwood Link Light Rail extension.

The City of Seattle acquired our first church and community center through eminent domain in 1970. Our community members donated their time, money and resources to acquire the new Property, build the Center and renovate an existing residence for caretaker use. Since completion of the new Center in 1971, our members, and many others from the surrounding region, have regularly used the Center for a variety of religious, educational and culturally significant activities. The Center can be best described as the religious and cultural hub of the Baltic community in the Northwest. We have attached documents summarizing the Center's history as well as current uses for your reference. In addition we have attached letters expressing concerns with the DEIS submitted by individual groups that regularly use the Center. The following are our comments regarding the DEIS.

I. Overall Impact

C-012-001 After careful review, we have concluded that none of the alternatives, as currently presented in the DEIS is acceptable to our church and community. All of the alternatives considered in the DEIS, other than the no build alternative, threaten the continued viability of the Center. The alternatives proposed in the DEIS, whether at-grade or elevated, at best significantly impact the current uses of the church and center and at worst, render the Center unusable in its

C-012-001

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.

C-012-001 entirety. The DEIS contains insufficient information to meaningfully evaluate how community events, our language school and church worship services would be impacted by the proposed alternatives. That said, noise and vibration levels at similarly situated properties in relation to existing light rail routes, indicate that the impacts to the Property would be intolerable without significant noise, vibration and other mitigation. All of the alternatives appear to take a substantial number of parking spaces or impact those spaces such that they may be unusable. In addition, the elevated alternatives would also create a negative visual impact and create a disturbance during any solemn event inside or outside the building.

C-012-002

C-012-003

C-012-004 Our main message regarding the DEIS is that all of the alternatives proposed will have significant negative impact to the Property and threaten the viability of our culturally rich ethnic community and activities that can continue only by virtue of the existence and functionality of the Center in its current location. Accordingly, our strong preference would be for the no build alternative. However, to the extent Sound Transit elects any alternative other than not building segment A, the following are our comments to the DEIS regarding the impacts caused and mitigation required.

II. At Grade Alternatives - Impacts and Mitigation Required

The at-grade alternatives (A1, A5, or A10), would require substantial changes from what is currently proposed in the DEIS if the Center is to remain in its current location. One change involves moving the route West far enough to avoid or minimize encroachment on the Property. This appears physically feasible and would substantially mitigate the impact of the alternatives to the Property.

In addition, the mitigation required would be acquisition of other property to restore lost parking, replace the caretaker's residence, and provide for a new ingress/egress. There are several adjacent residential properties that may be acceptable. In addition to mitigation for sound, vibration, and light among other things, these mitigation options for the impact of the at-grade alternatives would allow the Center to continue its existence at the current location, while at the same time allowing construction of the light rail line. Acquisition of a neighboring property would also partially mitigate the impact of the construction process, during which, it is also anticipated ingress and egress would be curtailed.

As currently proposed in the DEIS, the at-grade alternatives call for acquisition of our Property. As noted above, a second forced relocation of the Center in the 63 year history of the Baltic Community would be devastating and may lead to the demise of the Baltic community as a regional presence. The scope and cost of a re-location is incalculable on a cultural level, and difficult to assess on an economic level. If an at-grade alternative is selected without the above changes and mitigation, Sound Transit should immediately begin identifying three substantially comparable facilities within five miles of the Center that could be acquired and updated as necessary for our relocation and use.

C-012-002

The vibration and noise analysis for the church uses the FTA impact criteria. It is Sound Transit's policy to mitigate light rail transit noise that would otherwise result in moderate or severe impacts. See Section 4.7 of the Final EIS for updated impact and proposed mitigation information. Sound Transit's design for the Preferred Alternative also maintains the parking supply for the church and the center, although the configuration would be changed in some areas.

C-012-003

Your concern regarding visual impacts is noted and is consistent with information in the EIS. The impacts of the at-grade alternatives are rated as medium and include relocation of noise walls to the east and loss of vegetation as is illustrated in Figures G-16 and G-18. The impacts of the elevated alternatives are rated as high and include the visibility of the elevated guideways, which reduced intactness and unity of views and are illustrated in Figure G-17. Final design will continue to consider these impacts and potential mitigation.

C-012-004

Please see responses to C-012-001 and C-012-002.

III. Elevated Alternatives - Impacts and Mitigation Required

C-012-005 Based on the currently available information, the elevated alternatives will have similar impacts to our Property including increased noise, vibration and visual ill-effects. The DEIS fails to discuss the height or precise alignment of the track so we are left to speculate about these impacts. The DEIS also fails to provide sound testing results or information specific to our very unique property.

C-012-006 Regardless of the height of the elevated track, significant mitigation would be required. First, the track should be high enough to allow ingress and egress by large truck/trailers to the Property at its current location, otherwise new ingress and egress must be acquired. Second, the sound, vibration, visual and other ill-effects must be substantially mitigated to allow for continued use of the Property.

It is unknown to us at this time whether sufficient mitigation solutions exist to allow activities inside and outside the Center to occur without interruption under any of the above-grade alternatives. The elevated alternatives may allow for ingress and egress, depending upon track height, but do not reduce the mitigation requirements for the caretaker's residence and parking, which would require relocation or replacement. While the elevated route appears to avoid the necessity of the acquisition of the Property, we are concerned about the impact the noise, vibration and light effects would have on a candlelight service, a funeral service, a choir performance, or a class of seven year olds trying to learn Latvian language outdoors on a nice spring day.

IV. Concerns and Impacts Not Adequately Analyzed in DEIS

Regardless of which alternative is ultimately selected by Sound Transit, at-grade or elevated, there are a number of issues that affect the Property and our community which were not specifically addressed in the DEIS and therefore require further study. These issues include but are not limited to the following:

- C-012-007**
- The DEIS fails to include our property in several portions of the Technical Report for Noise and Vibration ("TRNV"). Section 3.1.1, Figure 3-1 and Section 3.2, of the TRNV note other churches and culturally significant properties along Segment A that were tested and studied for noise and vibration impacts and mitigation. Sound Transit needs to conduct the same study and testing with regard to our property.
 - TRNV attachments C and D of the DEIS lack noise and vibration projections for our property with regard to alternatives A1, A5, or A10. Since mitigation of the impacts of those alternatives may include relocating ingress and egress through the acquisition of additional property, the DEIS should include the noise and vibration projections for alternatives A1, A5 and A10.
 - Additional consideration needs to be given to designing the light rail alignment more to the West into the WSDOT right of way. The current alternatives presented in the DEIS appear to emphasize maintaining a separation between the freeway and rail line, as opposed to maximizing the separation between the rail line and our Center.

C-012-005

The elevated alternatives are rated as having a high visual impact on adjacent residential areas in the text and maps on pages 4-75 and 4-84 in Section 4.5.3 of the Draft EIS. In this case, the elevated guideway and overhead catenary would be readily visible and reduce intactness and unity of views from viewpoints to the east. The height of the elevated guideway relative to surroundings, including the Latvian Evangelical Lutheran Church, is shown in Figure G-17 in Appendix G of the Draft EIS. The conceptual plans provided in Appendix F of the Draft EIS provide greater detail on the alignment and the proposed light rail profile, including structural heights. Where applicable, information has been updated for the Final EIS.

Noise monitor location M-6 measured noise levels near the Latvian Evangelical Lutheran Church. The existing noise levels are described on page 4-110 and the extent of noise impacts are described on page 4-113 in Section 4.7.3 of the Draft EIS. The noise and vibration technical report provided further detail, but the monitoring location was used to predict noise levels and mitigation not only for the church, but also for surrounding residences, which are highly noise-sensitive.

C-012-006

Based on the design modifications developed for the Preferred Alternative (which were also applied to all of the at-grade alternatives) access to the property has been maintained through the realignment of the city street providing access to the church. See Section 3.2 of the Final EIS for a better understanding of the differences in impacts among the alternatives.

Depending on the alternative, noise mitigation includes a noise wall for at-grade alignment and the introduction of a 4-foot-tall to 8-foot-tall barrier at the edge of the elevated alignment. Vibration impacts would be mitigated by design measures that reduce the amount of vibration

C-012-008	<ul style="list-style-type: none"> The DEIS fails to discuss temporary construction impacts on the day-to-day operation of our church and center. Major considerations would include, but are not limited to, equipment staging, earth moving and pile driving. These activities have the potential to not only impact normal activities, but would also inevitably dramatically impact special social events and performances due to dust, noise, limited access and restricted parking. This will, in effect, discourage attendance of events, thereby causing lost revenues at fund-raising activities as well as an overall decrease in utilization.
C-012-009	<ul style="list-style-type: none"> The DEIS fails to recognize the significance of the caretaker's residence on the overall operations of Property. The presence of this structure at the entrance of the Property provides around-the-clock monitored access and security for the Center. In addition, the caretakers maintain the Center's building and surrounding grounds and provide real-time event scheduling. The Center could not function without such an arrangement in place and hence the role of this residence as an essential component must be discussed in the EIS and a replacement structure provided as mitigation, regardless of which option is selected.
C-012-010	<ul style="list-style-type: none"> The DEIS needs to identify and mitigate the site specific impact of a rail line which as proposed runs very close to the Center and the current ingress and egress. To assure adequate mitigation is provided site specific engineering and geotechnical studies must be performed. The noise, vibration, light and electro-magnetic interference impacts of trains operating in such close proximity during church services might severely curtail or possibly even eliminate our ability to hold church services. These impacts may also eliminate our ability to facilitate the events that frequently occur at the Center including but not limited to: rehearsals, musical performances, dinners, presentations, speeches, as well as special social and holiday events that make up the core of our community.
C-012-011	<ul style="list-style-type: none"> The DEIS fails to address the disruption caused at the Center's entry and within landscaped areas to religious gatherings, social events and Latvian school functions. A noise study that specifically addresses these potential impacts and defines necessary mitigation solutions must be performed, in view of trains coming through at 4-10 minute intervals.
C-012-012	<ul style="list-style-type: none"> The DEIS fails to note that the WSDOT felt that the noise and aesthetic impacts to the Center from I-5 were significant enough in magnitude to justify the installation of a full abatement sound wall along our property. Certainly, with the installation of any rail line, we would expect Sound Transit to replicate this level of mitigation. Additionally, the DEIS needs to recognize the aesthetic impact of a potentially large wall adjacent to the Center and caretaker's house. The DEIS must identify mitigation incorporating architectural design features into the wall face to soften its effect on nearby viewers.
C-012-013	
C-012-014	<ul style="list-style-type: none"> The DEIS notes that our Center may be eligible for the city of Seattle Landmark status, but that it does not meet the 50 year requirement for NRHP. The DEIS fails to consider that at the time of construction of any of the alternatives, our Property will meet the 50 year requirement for NRHP and may then be NRHP eligible. The DEIS should evaluate mitigation as though the Property is NRHP eligible.

energy from passing trains to the ground. See Section 3.6 for proposed transportation-related mitigation, Section 4.5.6 for proposed visual impacts mitigation, and Section 4.7.7 for proposed vibration and noise mitigation. Both the Transportation and Noise and Vibration Technical Reports have also been updated in the Final EIS to reflect changed conditions.

C-012-007

Individual properties are indicated in the Noise and Vibration Technical Report, and although we did not mention the church specifically in the affected environment section, because elevated alternatives did not have vibration impacts, it has since been added to the Final EIS Noise and Vibration Technical Report for all alternatives. However, here is a synopsis for the Latvian Evangelical Lutheran Church in the Noise and Vibration Technical Report for the Final EIS:

- The church impacts are mentioned under the elevated alternatives in Chapter 7.
- Noise monitoring sites are shown in Attachment A, and site M-6 is right behind the church at a residence.
- Detailed noise impact tables are in Attachment B, the Latvian Evangelical Lutheran Church is typically near the top on the second page of each set of tables (one set for each alternative; the church is only under Segment A).
- Attachment C has maps showing the impacts, for example, the Latvian Evangelical Lutheran Church is shown as an impact on Figure C-2a, Alternative A3 impacts.
- Attachments D and E are for vibration and the church is included by address only in Attachment D, and there is an analysis for each alternative, just like the noise. Attachment E is vibration data, and not relevant to the church.

In response to concerns raised about impacts to your church property, Sound Transit has revisited the alignments of the alternatives in Segment A. As now described in the Final EIS, none of the Segment A

C-012-015

- The DEIS needs to address changes to the wheel screeching and other sound issues readily discernible in existing rail lines and identify appropriate mitigation beyond that outlined in the DEIS.

V. Conclusion

C-012-016

It is essential that we preserve the Center at its present location and off-set any adverse impact with acceptable mitigating measures. For instances where the mitigation is insufficient, we expect adequate compensation to off-set any reduction of usefulness, enjoyment or economic value of the Center. In the event of acquisition by Sound Transit, unlike a house, or a commercial building, the dollar value of this kind of loss would be difficult to calculate due to the Center's cultural and historical significance.

We respectfully request that you review these materials and address our concerns carefully and favorably when coming to a conclusion about which of the alternatives to select. We also look forward to working with Sound Transit, and cooperating to mitigate any impacts to our Property. Thank you in advance for your consideration of our comments.

Sincerely,

Latvian Evangelical Lutheran Congregation of Seattle



Andrejs Zamelis, President

Latvian Association of the State of Washington



Sarma Davidson, Chairman

alignments would displace the church building, but the western part of the property would be needed. However, Sound Transit's intent is to avoid displacing your church and community operations from the property due to light rail operation.

C-012-008

While the Draft EIS does not detail property by property the specific construction effects for each alternative, it did note that properties along the alignment would be subject to typical construction impacts. See section Section 4.5.3 (Visual), Section 4.7.3 (Noise and Vibration), and Section 3.2.4 (Traffic and Access). Section 4.4.6 also described the construction planning and coordination with affected property owners that would occur. See the Noise and Vibration Technical Report for property-specific information. Mitigation measures are also identified in the EIS for visual (Section 4.5.6) and noise and vibration (Section 4.7.7) impacts.

C-012-009

The realigned roadway needed to maintain access to the property would involve relocating the caretaker's residence, but Sound Transit would provide financial assistance and other services for the relocation, which would include a review of options for relocating near the church. Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for the alternatives.

C-012-010

Please see response to C-012-001 regarding revisions to the A alternatives and response to C-012-002 regarding visual impacts. The noise analysis for the church uses the FTA impact criteria and Sound Transit mitigates noise impacts to levels below that criteria. The

THE LATVIAN COMMUNITY CENTER
HISTORICAL & CULTURAL OVERVIEW

Over 1000 people of Latvian origin sought refuge in the Pacific Northwest after the end of World War II, rather than return to their homelands which had been illegally annexed by the Soviet Union. There were also immigrants of two other Baltic nations: Lithuania and Estonia. Latvian immigrants founded the Washington State Latvian Association in 1949 and the Latvian Lutheran Evangelical Congregation of Seattle in 1950. Their first Seattle home, purchased in 1955, was located at 4233 Densmore Avenue North in Seattle. The desire to congregate with fellow Balts led to developing the building for use as a church, school and social center. Thirteen years later in 1968, the City of Seattle announced its intent to acquire this property through the process of eminent domain in favor of developing the Wallingford Playfield and by 1970 the acquisition was completed.

The Latvian community raised funds and broke ground at 11710 3rd Avenue NE, Seattle on March 31, 1971. The new Latvian Center was designed and constructed by volunteers who donated over 8500 hours of their time after work and on weekends. The Center includes a church, minister's office, a large hall with stage and kitchen, classrooms and meeting rooms, a library, a playground, a caretaker's home and a parking lot. The dedication ceremony was held at this site on February 6, 1972. It was officiated by the Archbishop of the Latvian Evangelical Lutheran Church in Exile Arnold Lūsis, Dean Robert Āboliņš of the Seattle congregation and 11 other clergymen. The attendance of so many church leaders from across North America attests to the significance of this event well beyond Seattle.

The Latvian Community Center is the sole facility in Washington State serving the Latvian, Estonian and Lithuanian communities. It has been visited by Baltic presidents, ambassadors and governmental ministers, as well as U.S. Senators and Representatives. The current president of Latvia, Andris Bērziņš, is scheduled to visit on September 22, 2013. It is an official voting precinct for the Latvian government, serving citizens of Latvia who reside in our region. The Center is crucial for the continuation of Baltic cultural, educational and religious activities in the Northwest.

The Latvian Community Center, in addition to its broader cultural events, has also been the site of many family and personal celebrations. Both the church and center's hall have been used for weddings, christenings and confirmations, as well as anniversaries and birthdays. Many members of our community have had their memorial services and funerals at the very same location.

Multiple generations of Latvians work hard with each other to pass on their rich heritage at the Seattle Latvian Community Center. The Center's large dance hall and stage accommodates weekly Latvian folk dancing and choir rehearsals. We are proud to share this cultural wealth by performing folk dances at the Seattle Public Library, singing and dancing at Bellevue Sister City events and at Northwest Folklife, as well as opening the Center's doors to the general public for events such as the Christmas bazaar, spring rummage sale and concerts. Losing the Latvian Community Center would be a severe and eventually fatal blow to this vital community. An outline is attached describing the many groups that currently use the Latvian Community Center on a regular basis.

FTA criteria for noise are based on exterior noise levels and are more stringent than the criteria for traffic. It is Sound Transit's policy to mitigate moderate or severe impacts. Section 4.7.7 of the Final EIS describes the potential mitigation measures. As described in earlier responses, the Final EIS includes updated information on impacts and mitigation now that the at-grade alternatives do not displace the church. Section 4.13 of the Final EIS discusses electromagnetic fields, which are produced whenever electricity is used. No sensitive receptors (i.e. hospitals, radio stations) are within the range of the light rail line. It is not expected that the light rail would interfere with the Latvian Evangelical Lutheran Church's radio.

C-012-011

Please see noise discussion in response to C-12-010.

C-012-012

Noise walls are planned for all alternatives in this area, either at-grade or elevated, as mitigation for the light rail impacts. In addition, if any existing WSDOT noise walls are removed and replaced as part of the project, they will be placed and designed to provide the same or better noise reduction as the existing wall, with no increases in highway noise levels.

C-012-013

Please see responses to C-12-003 and C-12-005.

C-012-014

The Latvian Evangelical Lutheran Church, built in 1971, does not meet the age criteria for the National Register of Historic Properties (NHRP), but it does meet Seattle's 25-year threshold for landmarks. See Section 4.16.1 and Section 4.16.2 of the Final EIS for additional information on the landmark process.

THE LATVIAN COMMUNITY CENTER
11710 3rd Avenue NE, Seattle, WA 98125

USE BY LATVIAN GROUPS

Latvian Evangelical Lutheran Congregation of Seattle

- Established in 1950
- Over 300 members in 2013
- 48 church services in 2012; three per month in Latvian, one in English
- Site of christenings, confirmations, weddings, funerals, ordinations and archbishop visits
- Congregational breakfasts and potlucks follow services on holidays
- Funds are raised to support congregations and rebuild churches in Latvia
- Daira Cilne, the congregation's fourth pastor, has served since 2002

Ladies' Committee of the Latvian Evangelical Lutheran Congregation of Seattle

- Prepares food for church socials
- Raises funds to support the church and other charitable causes

Latvian Association of the State of Washington

- Established in 1949
- 295 members in 2012; over 800 Latvians in Washington state
- Organizes cultural and educational activities at the Center
 - Observance of Latvian national holidays and anniversaries
 - Performances by touring Latvian musicians and theatrical groups
 - Performances and events typically attended by 80 – 200 people
 - Christmas Bazaar; food and culture shared with the Seattle community
 - Rummage Sale; raises funds for Center maintenance
 - Christmas Bazaar and Rummage Sale visited by hundreds from the Latvian, Seattle and greater Puget Sound communities
 - Art shows by local Latvian artists
- Supports education
 - Scholarships for youth to attend Latvian summer high schools
 - Donations to the Seattle Latvian School and summer high schools
 - University of Washington Baltic Studies Program fundraising events
- Publishes a bi-monthly newsletter of events and news in Latvian and English. Mailed to 335 current and former members of the Association. A few times a year it is mailed to an expanded list of 650 Latvian addresses in Washington State.

Seattle Latvian School

- Established in 1950
- The curriculum includes Latvian language, literature, history and culture
- Twenty students in the 2012-2013 academic year
- Classes take place Saturday mornings from fall through spring

C-012-015

Wheel squeal only occurs on tight radius curves, not on a straight section of track, like the ones along this segment of the corridor.

The noise analysis for the Lynnwood Link uses the FTA impact criteria and Sound Transit mitigates noise impacts to levels below this criteria. The FTA criteria for noise are based on exterior noise levels and are more stringent than the criteria for traffic. Sound Transit's policy is to mitigate moderate or severe impacts. Potential mitigation measures for noise are described in Section 4.7.7 of the Final EIS.

C-012-016

Please see the previous response to comment C-012-004.

As noted in Section 4.1, any acquisition of property would involve compensation to the property owner in accordance with the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970; the Washington State property acquisition policies and procedures in Chapter 8.26 Revised Code of Washington (RCW); and Sound Transit's adopted Real Property Acquisition and Relocation Policy, Procedures, and Guidelines.

**Use of the Latvian Community Center
11710 3rd Ave NE Seattle**

- The school prepares students to attend Latvian summer high schools and university programs in the US and Latvia
- School graduate, Pēteris Elferts, was a member of Latvian Parliament and served as Latvian Ambassador to Ireland.

Latvian Folk Dance Group Trejdeksnītis

- Established in 1962 for teaching traditional Latvian folk dances
- 28 dancers in 2012, mostly high school and college students
- Rehearsals at the Center every Sunday, September through July
- Annual performances and events at the Latvian Center
 - Trejdeksnītis Spring Program; in 2013 it served as a fundraiser for the group's trip to Latvia to take part in the Latvian Song and Dance Festival
 - Christmas Bazaar
 - Host the New Year's Eve celebration for the Latvian community
 - Skandia Folkdance Society Annual Ball
- Annual performances for the Seattle area community
 - Seattle Public Library's Baltic Rites of Spring, in its 9th year in 2013
 - Yulefest at the Nordic Heritage Museum
 - Folklife Festival at the Seattle Center
- Performances at Latvian Song and Dance Festivals
 - In the past ten years alone: San Francisco, Toronto, Indianapolis, Ventura, Milwaukee, and Hamilton, Canada
 - In 1990, 1998 and 2013 – Riga, Latvia

Seattle Latvian Choir

- The Latvian choir "Sigulda" rehearses at the Center weekly
- Its 25 members perform in church on holidays, and in the hall at various events, including the commemoration of Latvia's Independence Day
- The choir has performed at many Latvian Song and Dance Festivals
- In 2012 "Sigulda" performed at Bellevue City Hall to honor the 20th anniversary of the sister city relationship between Bellevue and Liepāja

Latvian Cooking and Handcraft Groups

- The Latvian cooking group meets in the Center kitchen on Saturdays. Experienced chefs and bakers share Latvian recipes with younger generations.
- Two handcraft groups meet regularly at the Center to create traditional handcrafts and assist folk dancers in making Latvian folk costumes. One member, Skaidrīte Āboliņa, was recognized by the City of Seattle and the Governor for her culturally significant work.
- Raises funds hosting lunches and events for Center maintenance and charities

**Use of the Latvian Community Center
11710 3rd Ave NE Seattle**

Seattle Latvian Library

- A volunteer-run lending library of books and recorded materials in Latvian
- Duplicates received from private collections are donated to libraries in Latvia
- Provides reading material for the Latvian Book Club

Latvian Fraternities and Sororities

- Meetings and events, including the annual University Ball
- Fundraising and charitable activities

Latvian Seniors

- Meet at the Center monthly for lunch and activities
 - Presentations and discussions about culture and current events
 - Show movies, TV specials and slides from Latvia or on Baltic issues
 - Entertain on another with skits, songs and poetry

Seattle Latvian Golf Association.

- Annual golf tournaments at Jackson Park Golf Course are followed by an awards dinner at the Center; in its 12th year in 2013
- In 2013 - 72 participants from Seattle, California, Arizona, Illinois and Michigan

USE BY THE LATVIAN GOVERNMENT

Voting precinct

- The Center is one of 15 voting precincts in the U.S. for Latvian national elections
- 125 people from Washington state and B.C. cast votes for the Latvian Parliament in 2011
- Many American Latvians have dual U.S. and Latvian citizenship, with voting rights in both countries

USE BY BALTIC AND ACADEMIC COMMUNITIES

Estonians and Lithuanians

- Estonians hold a church service at the Center once a month
- Lithuanians and Estonians celebrate national holidays and special events at the Center
- Memorial church service and program to remember Balts deported by the Soviets, organized and attended annually by Estonians, Latvians and Lithuanians

Baltic Studies Program at the University of Washington

- Annual fundraising auction and dance at the Center for the Baltic Program Fund

**Use of the Latvian Community Center
11710 3rd Ave NE Seattle**

- Since 1994 Estonian, Latvian and Lithuanian languages, culture, literature and history have been taught at the University of Washington. This is the only such program in the U.S.
- The Baltic Program Fund, also since 1994, supplements the Program's budget and is building the Endowment for the Baltic Program to ensure a permanent program
- The University of Washington Tour Choir visited Estonia and participated in the Latvian Song and Dance Festival in July, 2013

LATVIAN COMMUNITY CENTER CARETAKER HOME

- For 25 years the Petersons family has lived in the home on the property and cared for the Center building and grounds
- Their round-the-clock presence provides added security
- Selga Petersons coordinates the Center calendar and caters many events there, including a monthly lunch for Latvian seniors

A TYPICAL WEEK AT THE LATVIAN COMMUNITY CENTER

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Latvian Lutheran Church (weekly)		Latvian senior lunch (monthly)	Latvian choir rehearsal (weekly)			Latvian school (weekly)
Latvian folk dance rehearsal (weekly)			Latvian Association Board meeting (monthly)			Latvian cooking and handcrafts groups (weekly)
Estonian Church (monthly)						

C-012-017

Please see the response to C-009-001.



LITHUANIAN-AMERICAN COMMUNITY

WASHINGTON STATE CHAPTER
1019 NE 130th Street, Seattle, WA 98125-4069
(206) 282-9910 • lithseattle@hotmail.com

September 16, 2013

Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Sound Transit Board,

C-012-017

I am writing to express my concern regarding how the proposed light rail line will affect the Latvian Lutheran Church. The Latvian Center (the Church and its large hall) is used heavily not only by Latvian-Americans but Lithuanians and Estonians as well. Negative impacts must be minimized at all costs.

We Lithuanians do not have our own church, school or office buildings. We rely heavily on our brother Balts, the Latvians, to share their Latvian Center with us. Although over the last 40 years we have been "renters" and not "owners" of the facility, we have come to cherish it as our own.

The Lithuanian-American Community of Seattle has enjoyed the use of the Latvian Center for community celebrations and other events such as fundraisers for the Baltic Studies Program at the University of Washington.

The Latvian Center has been the site of folk dance practices and performances, concerts by local and visiting Lithuanian musicians, wedding receptions and memorial services. The hall has hosted visiting dignitaries such as Vytautas Landsbergis, the first head of state of newly independent Lithuania, Senator Maria Cantwell, Congressman Jim McDermott, two Lithuanian Ambassadors to the United States, and trade delegations from Lithuania.

We have gathered at the Center for these and many other community-centered commemorations, often in conjunction with our Baltic brothers and sisters (for example, the annual joint church service and commemoration of the deportations of Estonians, Latvians, and Lithuanians to Siberia). We have held educational lectures, fundraisers, and political meetings. And for decades during the Soviet occupation of the Baltics, the Latvian Hall was the gathering place for community activists working together on critical items related to re-establishing the independence of our three countries.

The Center, with its many organizations and activities, serves as our extended family, especially to those of us who immigrated to America without grandparents, uncles, aunts and cousins. Once torn, the rich social fabric of the Latvian Center may be irreparably compromised.

The Seattle Lithuanian-American Community feels very strongly that preserving the Latvian church and community hall in its present location, and keeping it open during construction, is of paramount importance not only to the Latvian community but to the Lithuanian and Estonian communities as well.

Rimas Miksys

President

Lithuanian-American Community, WA State Chapter



*Honorary Consul of the Republic of Estonia
in Seattle, Washington*

September 11, 2013

Sound Transit
Draft EIS comments
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104

Dear Members of the Sound Transit Board,

C-012-018

I am writing to you in hopes of helping convey a strong message in support of preserving the Latvian Community Church and Meeting Hall located at 11710 – 3rd Ave. NE, Seattle, WA. It is my understanding that Sound Transit is considering possible routes through northeast Seattle which might impact the Latvian Hall.

C-012-019

As a member of the Seattle Estonian Community, the Latvian Hall represents as much of a “home” to our community as it does to Seattle-area Latvians as well as Lithuanians. As our community is smaller than the Latvian community, we have for decades rented the Latvian Hall as the centerpiece of our community meetings, holiday celebrations and cultural gatherings. The Latvian Hall has hosted visiting Estonian Presidents, members of Parliament and other dignitaries. It has also, on a personal note, naturally served as the site of my wedding in 2004, and hosted the funerals of my family members.

The Seattle Estonian community cherishes the Latvian Hall and our relationship with the Latvian and Lithuanian communities. The Latvian Hall is the foundation of that relationship and with its large auditorium, church and meeting rooms, it uniquely serves this purpose for our mutual use. The history we have shared over the decades within the walls of the Latvian Hall is immeasurable. During the Soviet occupation of the Baltic States, the Latvian Hall was a rallying place for legislative and political efforts in support of re-establishing independence in our homelands. Subsequent to the

9133 View Avenue NW
Seattle, Washington 98117

Phone: (206) 310-2153
Fax: (206) 284-4061

C-012-018

Please see the response to C-005-001.

C-012-019

Please see the response to C-005-002.



***Honorary Consul of the Republic of Estonia
in Seattle, Washington***

C-012-019

culmination of those efforts, the Latvian Hall continues to bind our communities through co-hosted community celebrations, fundraisers and commemorations.

I simply cannot imagine a vibrant Estonian, Latvian or Lithuanian community existing in Seattle without the Latvian Hall. I implore you to preserve this most important foundation of our shared community.

Most sincerely,

Paul A. Raidna
Honorary Consul
Republic of Estonia



9133 View Avenue NW
Seattle, Washington 98117

Phone: (206) 310-2153
Fax: (206) 284-4061

September 16, 2013

Sound Transit
Draft EIS Comments, c/o Lauren Swift
401 S. Jackson St., Seattle, WA 98104

To the Sound Transit Board:

C-012-020 We are writing to express our concern for the future of the Latvian Community Center, located at 11710 - 3rd Avenue Northeast. As you know, the Center's activities will be affected by the light rail extension that is planned along Interstate 5.

The University of Washington's Department of Scandinavian Studies maintains close ties to Seattle's Latvian, Estonian, and Lithuanian communities, who all organize many events at the Latvian Center. Students and instructors in UW's international studies programs attend concerts, lectures, films, and theater performances, to learn about these countries and their people. Student tickets and parking are inexpensive (much cheaper than flying to the countries!), because the Center is owned by the Latvian community. The Scandinavian Department's Baltic Studies Program is the only program in the United States to teach Estonian, Latvian, and Lithuanian, three languages that are often spoken at Latvian Center events where UW's foreign language students can practice their language skills.

The UW Scandinavian Department also organizes events at the Latvian Center. The Center's central location, parking lot, and kitchen facilities make it an ideal place for community outreach activities such as our annual "Baltic Saint Martin's Day" celebration, lectures, and other events that UW co-hosts with community organizations.

C-012-021 For the next few years, construction of the light rail line will disrupt these educational events for our students and faculty, as well as UW community outreach opportunities at the Latvian Center. We hope that when construction is finished, the Latvian Center will be able to continue hosting the vibrant cultural life that enriches the education of our students and teachers and off-campus communities.

We hope that representatives of Sound Transit will be able to attend the UW Baltic Program's "Martin's Day" celebration on October 26, 2013, to see for themselves that the Latvian Center is an incredible gift to the Seattle community. We hope that Sound Transit will take every possible step to ensure that the Center can continue its activities during and after light rail construction.

Please contact the Department of Scandinavian Studies if further information is needed.

Sincerely,

Jan Sjävik, Chair


Guntis Šmidchens, Associate Professor

UW Department of Scandinavian Studies, 206-543-0645; uwscand@uw.edu

318 Raytt Hall Box 353420 Seattle, WA 98195-3420

206.543.0645 fax 206.685.9173 uwscand@uw.edu <https://scandinavian.washington.edu/>

C-012-020

Please see the response to S-002-001.

C-012-021

Please see the response to S-002-001.

C-012-022

Please see the response to C-041-001.

Ann-Marie Peterssons
Co-Director
Seattle Latvian School
11710 3rd Ave N
Seattle, WA

September 20, 2013

Sound Transit
C/o Lauren Swift
401 Jackson Street
Seattle, WA 98104

Dear Sound Transit:

C-012-022

On behalf of the Seattle Latvian school students, families and graduates we would like to express our concerns about the Northgate light rail expansion.

The Seattle Latvian School was established in 1950 for the purpose of teaching Latvian language, culture, and history. Since its inception, it has been a significant pillar in the small but active Latvian community in the Pacific Northwest. Hundreds of students have graduated from the school and as adults most students continue to be active participants within the larger community. The effect is that the school has a generational impact on our community. Almost all of the parents of our current students attended our school when they were young.

The Latvian Center and Church has several dedicated classrooms for the school. This enables our teachers to create an immersive cultural environment for our children. It would be very difficult to re-create this environment should we need to look for an alternative location to hold our school.

Our enrollment ranges in size from 25 to 50 students and this fall we will welcome 25-30 pupils. Currently, all of our students are under 9 years of age, although typically we have students from 3 to 14 years old. We are disheartened to think that these children might not have an environment to further their Latvian education as they grow older.

C-012-023

Please see the response to C-041-002.

C-012-023

Sound Transit
September 20, 2013
Page 2

We urge the transit commission to work closely with the Latvian and Northgate communities to find a solution that allows continued access to the building and mitigates all impacts so that our School can continue operating successfully. Impacts to the school from the light rail include, but are not limited to, noise coming from the tracks during outdoor time, vibration, and lack of parking in the event any of the alternatives result in reduction in parking. In addition, Sound Transit should plan to relocate the school temporarily during construction since a closure of the school for any period would be disruptive to the children and the education we provide.

While school is primarily on Saturday mornings, we also have several events that are held on weekend evenings with adults and community members are present. If parking is severely limited, this will impact our ability to hold those events.

Thank you in advance for reviewing our school's comments and taking them into consideration when considering this expansion of mass transit.

Sincerely,

Ann-Marie Petersons

C-012-024

Please see the response to C-035-001.



SIGULDA

Sound Transit DEIS Comments
c/o Lauren Swift
401 S. Jackson St
Seattle WA 98104

September 18, 2013

Re: Lynnwood Link Light Rail Extension

I am writing on behalf of the Latvian choral ensemble Sigulda, based in Seattle. Our 25 member group was established in 1985 and has performed at multiple events in the Seattle area over the years. Sigulda sings for Latvian functions and church services, as well as for other community performances, including Northwest Folklife and the Bellevue Sister Cities Association.

C-012-024

It is a great concern to us that the Seattle Latvian Community Center is endangered by all of the alternatives currently proposed in the DEIS. We hold weekly rehearsals in the hall at the Center, located at 11710 3rd Avenue NE. We have always had a need for piano accompaniment and hence have never been able to fit rehearsals of that size in any one individual's home.

We urge Sound Transit to find an acceptable version of developing the light rail project through the Northgate area that allows the Seattle Latvian Community Center & Church to remain a vital, functioning property. There simply is no other location within the Baltic community that serves such a prominent role throughout the Pacific Northwest.

Please consider the needs of the local citizens who use this Center so frequently and on so many different levels, as you move forward with this project. Thank you for your consideration.

Sincerely,

Inese Bergman, Sigulda member
611 Birch St
Edmonds WA 98020



Sound Transit
Draft EIS Comments
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104
LynnwoodLinkDEIS@soundtransit.org

Dear Sir or Madam:

C-012-025

I am writing today regarding access to the Latvian Cultural Center (next to I-5 near 117th and 3rd) during and after construction of the planned light rail extension to Lynnwood. As the current Artistic Director of Seattle's Latvian folk dance ensemble, Trejdeksnitis, I would like to impress upon you the need for access to our rehearsal and performance space.

Trejdekstnitis has 3 hour rehearsals every Sunday evening during the dance season, roughly September through the following July. We are not only learning the traditional dances that have been taught to Latvians for many years, we are learning new dances from Latvia as well. We also have a number of choreographers in our group that create dances each and every year for us to learn. A number of these have received top awards at the North American Latvian Song and Dance Festivals. These festivals are just a few of the performances we participate in.

Currently, we regularly perform around the greater Seattle area at a number of functions including: Yulefest at the Nordic Heritage Museum, annual Christmas Bazaar at the Seattle Latvian Cultural Center, Baltic Rites of Spring (initiated almost 10 years ago by the Seattle Public Library) at the Downtown branch of the Seattle Public Library, annual Spring Program at the Seattle Latvian Center, Folklife at the Seattle Center, and the Midsummer Festival called Jani at the West Coast Latvian Educational Center near Shelton. Last year we were also asked to perform at the annual meeting for the American Latvian Association, and the annual Ball for the Skandia Folkdance Society, which was held at the Seattle Latvian Center for the first time. The Skandia Folkdance Society was so impressed with the venue that they immediately booked it for the following year. This year we have already been asked to perform at the holiday bazaar at the Portland, OR Latvian Center, and at the annual St. Martin's Eve fundraiser for the Baltic Studies Program at the University of Washington held at the Seattle Latvian Center.

Last Summer we danced in Riga, Latvia as performers in the Latvian National Song and Dance Festival. This event occurs every 5 years and this year involved almost 15,000 dancers. It was

TREJDEKSNĪTIS - 11710 3rd Ave N.E. - SEATTLE, WA 98125 - www.trejdekstnitis.org

C-012-025

In response to concerns raised about impacts to the church property, Sound Transit has revisited the design details of the Segment A alternatives. As now described in the Final EIS, none of the Segment A alternatives would displace the church building, but the western part of the property would be needed. However, Sound Transit's intent is to avoid displacing your church and community operations from the property due to light rail operation.

C-012-026

an amazing experience for us, and for some a once in a lifetime event. Trejdeksnitis participated in the same event back in 1990, 1993, 1998, and we hope to be there in 2018.

However, to make it there we must have access to our rehearsal space. Currently we don't pay any rent at the Seattle/Latvian Center since we are under the umbrella of the Latvian Association of the State of Washington. If we had to go elsewhere for practice we would have to pay an average of \$300 per week, and dancers would have to start paying dues to cover the cost. Currently we pay none. If this occurs, we would lose many if not all of our dancers. The majority of the dancers are in school, (High School - Graduate level) and would not be able to afford it.

It is imperative that all construction related impacts to the Seattle Latvian Center be mitigated in a manner which allows our continued use of this facility during construction and that the long term impact resulting from the operation of the light rail system be mitigated in a manner allowing our continued use of this facility.

If we lose access to the Seattle Latvian Center, even for a few months, this will not only cost us money for rehearsal space rental that we cannot afford, but might cost us dancers as well. We are a volunteer organization and the harder you make it for people to attend, the harder it is to get them to keep coming back. Currently we have 4 performances scheduled between now and Thanksgiving. This could well be the case every year from now on. Thus we desperately need access to the Seattle Latvian Center to be uninterrupted each and every year.

If you are interested in seeing what sort of dancing we do, I invite you to look us up on youtube, and to take a look at our facebook page

<https://www.facebook.com/pages/Trejdekstnitis/160625053988041?ref=hl>

Thank you for your time, and I look forward to hearing from you.

Kathrine Young
Artistic Director, Trejdeksnitis

TREJDEKSNĪTIS - 11710 3rd Ave N.E. - SEATTLE, WA 98125 - www.trejdekstnitis.org

C-012-026

Thank you for your concerns about the potential displacement of the Latvian Evangelical Lutheran Church and for highlighting its significance to the region's Baltic community. This was the most frequent topic noted in the Draft EIS's public comment, and the Sound Transit Board subsequently directed Sound Transit to explore a Preferred Alternative that would avoid displacing the church. Since the publication of the Lynnwood Link Extension Draft EIS in June 2013, additional engineering was undertaken to reduce adverse effects on the Latvian Evangelical Lutheran Church property and facilities located at 11710 Third Avenue NE, Seattle. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained.

Several sections in the environmental document have been updated to address these changes including: Section 2.5.1 describes the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative. Compensation would be provided if the alternative selected for construction would require acquisition of land or improvements as is required by the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970; the Washington State property acquisition policies and procedures in Chapter 8.26 Revised Code of Washington (RCW); and Sound Transit's adopted Real Property Acquisition and Relocation Policy, Procedures, and Guidelines.

Construction of the light rail guideway in proximity to the Latvian Evangelical Lutheran Church would take approximately 1 to 2 years, a



AMERIKAS LATVIEŠU APVIENĪBA
American Latvian Association in the United States, Inc.

400 HURLBY AVENUE
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TEL: (301) 340-1914; FAX: (301) 340-8732

August 28, 2013

Pat McCarthy
Pierce County Executive
Sound Transit Board Administration
401 S. Jackson Street
Seattle, WA 98104

Dear Ms. McCarthy:

C-012-027 We are writing to you on behalf of the American Latvian Association Board of Directors and the 90,000 member strong US Latvian Community to express our deep concern regarding the news from Seattle Latvian Organizations that their historic Community Center is in jeopardy due to the Sound Transit plans of extending the Lynnwood Link railway line.

C-012-028 The Seattle Latvian group is our largest member organization with several hundred active Latvian families, who utilize the property at 11710 3rd Avenue NE as the “epicenter” for ethnic activities. Regular Church services, Sunday school for children, ethnic celebrations and gatherings, Latvian choir and dance group rehearsals, as well as weddings and funerals take place there. It is one of the three largest and best organized Latvian centers on the West coast, in addition to Los Angeles and San Francisco.

ON A LARGER SCALE, it is not only the Latvian community that would be affected by the proposed transit line; the center is regularly used by Estonians, Lithuanians and even the students at the University of Washington Baltic Study program – the only such program in the United States.

HISTORICALLY, The center is of important cultural heritage and importance to Seattle area Latvians and Balts. When the Latvian refugees were admitted to the United States after the WWII, several hundred settled in the Seattle area. They organized, purchased land and built the first Latvian Center on Densmore Avenue North in 1955. Unfortunately, in 1969, the City of Seattle took the property for development of the Wallingford Playfield. Next year, the history may repeat itself – the second center, built by Latvian volunteers in the 1970s on the 3rd Avenue, is in danger of being expropriated.

The center is crucial for the continuation of Latvian and Baltic cultural, educational and religious activities, it has been visited by all the Baltic presidents, ambassadors and several government ministers, as well as US Senators and ambassadors. It is the home of:

- Seattle Latvian Evangelical Lutheran Church, established in 1950
- Washington State Latvian Association, established in 1949
- Seattle Latvian School, established in 1950
- Latvian Folk dance group “Trejdekašņitis”, established in 1962
- Seattle Latvian Choir
- Seattle Latvian Library
- Latvian student fraternities and sororities
- Latvian Seniors’ club.

(Over, please)

longer period for elevated alternatives. Construction work would predominantly occur between 8 am and 6 pm during weekdays with occasional nighttime and weekend construction. Near-term construction activities would be communicated to adjacent property owners through a proactive community outreach plan and may include newsletters, Internet postings, community meetings, and direct contact by a Sound Transit representative. Reconstruction of the noise wall on the west edge of the church property would require negotiation of a temporary construction easement that would be negotiated prior to the start of construction.

Sound Transit intends to maintain access to the church and community center buildings during construction, though the access may differ somewhat from existing conditions for short periods. Other short-term impacts would include visual, air quality, and noise impacts. They would be avoided and minimized with the implementation of best management practices. These would include fencing the construction area for public safety, spraying the construction area with water to reduce dust, and use of temporary noise walls where practical. For additional information, see Sections 4.5.7, 4.6.7, and 4.7.7, respectively.

C-012-027

Please see response to C-002-001.

C-012-028

Please see response to C-002-002.

C-012-029

Please see response to C-002-003.

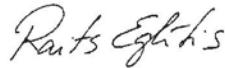
IN ADDITION, it is the place for one of the 15 polling centers in the United States organized by the Latvian government and the American Latvian Association for Seattle area Latvian citizens to cast their ballots in Latvia's National Elections.

C-012-029 Please keep Seattle diverse! Do not allow the proposed transit line destroy the Latvian Center! If we lose this site, we lose more than a building, and we fear that the local Latvian community will not have the means, manpower and moral strength to rebuild their center for the third time!

Sincerely,



Anita Batarags
President and Board Chair



Raits Eglitis
Secretary General

C-012-030

Please see response to C-034-001.



SEATTLE LATVIAN LUTHERAN CHURCH
11710 3rd Ave. NE, Seattle, WA 98125

Pastor Daina Cilnis, D.Min.
10702 Lakeside Ave. NE, Seattle, WA 98125
206-674-9600
cilnis@earthlink.net

September 18, 2013

Sound Transit Comments c/o Lauren Swift
401 Jackson St.
Seattle, WA 98104

To the Board of Sound Transit:

C-012-030

The Seattle Latvian Lutheran congregation is experiencing a feeling of *deja vu*. Yet again it has become a possibility that our church and community center will be taken from us, as it was 44 years ago. For the older members—this is the place they built with their hands, volunteering their time, after work and on weekends. Built not only with brick and mortar, but also with hopes and dreams—a center for their children and grandchildren, so that they too could learn about their Latvian heritage.

In the 42 years since we are in our present location, this has become our Latvian church home. It's where we gather on Sundays to worship in the language of our heart—the only place in Seattle, where services are held in Latvian. And, since our community has now grown to include many "adopted Latvians" who many not speak the language, but do feel at home—we also have services once a month in English.

It's the spiritual home to which our children and grandchildren return for Christmas and Easter. It's where we celebrate the birth and baptism of our little ones. (Next Sunday, we will be baptizing Kevin Erik, whose mother was also baptized in our church—a continuity that adds richness of meaning for both parents and grandparents!)

It's where we rejoice with young couples (and occasionally, not so young!) as they set out on the journey of marriage—and where we mourn those whose life journey has come to an end. In church, our family home.

I speak for all of us—the founding members who built our church, their children who are now bringing their own children here, as well as our dear "adopted" Latvians: it is our hope and our prayer that this time it won't be *deja vu*, that Sound Transit will find a way to let us remain in our church home that is so important to our lives.

Sincerely,

Pastor Daina Cilnis



Latvian Association of the State of Washington

P.O. Box 75081
Seattle, WA 98175-0081

Sound Transit
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104

C-012-031

We, the 300+ members of the Latvian Association of the State of Washington, are deeply concerned and bitterly disappointed about your proposed Light Rail plan. If the plan proceeds, it will drastically disrupt the well-being and perhaps even destroy the existence of the Latvian Lutheran Church and Cultural Center. Your planned construction of the Light Rail link between Northgate and Lynnwood does not seriously consider the social, cultural and physical impact on our old and well established multifunctional Center.

C-012-032

As you know, our first church and cultural center was taken for a park by the city of Seattle in 1969. Now it appears that we are facing possible condemnation and eviction for the second time in our 62-year history. In addition to our bitterness about the proposed plan, we most emphatically feel that virtually no consideration was given in your earlier planning to our facilities and the organizations which depend upon the Center. Although your current options do take minor note of our existence, those options are nonetheless inadequately thought through and need considerable further study. Issues of concern include, among others, track alignment, access, construction impact, noise abatement, geotechnical matters and the destruction of our caretaker's house.

C-012-033

In our opinion, Sound Transit has not fully examined nor addressed and given clear responses to our concerns. There also has been no meaningful rail alignment option given, such as relocation of the rail bed. There have been no solutions offered for the noise problems, vibration, lights and radio interference nor is there evidence of geotechnical studies having been performed.

For these reasons we request that you seriously review your plans and reconsider the DEIS and provide us with other workable alternatives.

Sarma Davidson,
Chairperson

Sarma Davidson	Inta Wiest	Valdis Jodanis	Talis Jaundaleris	Aina Uskars	Ingrid Doherty	Paul Kalnins
Chairperson	Vice-Chairperson	Treasurer	Assistant Treasurer	Secretary	Membership	Board Members

C-012-031

Please see response to C-030-001.

C-012-032

Please see response to C-030-001.

C-012-033

Please see response to C-030-001.



Karlis Lenšs
Amerikas Latviešu Jautatnes Apvienība

September 18, 2013

SOUND TRANSIT
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104

To Whom It May Concern,

I am writing to you on behalf of the American Latvian Youth Association ("ALJA"). Our mission, since our founding in 1952, has been the furtherance of Latvian culture, language, and knowledge among Latvian youth across all of the United States. Over the past 61 years, we have had thousands of members throughout the country, and we are currently as active as ever in our history. While most of our membership resides in the Midwest, a core component of our ability to succeed in our mission is broad support from all of the Latvian community centers in the country. Since 1971, we have frequently used the Seattle Latvian Center for meetings and events. In addition, on several occasions, we have held our biggest annual event, Congress, in Seattle. From our perspective, The Latvian-American "experience" in Seattle is not rooted in Pike Place Market or the Space Needle. It is the Seattle Latvian Center, nestled amongst towering evergreens on the north Side of town, that for generations has served and nurtured our tight-knit community. While it may seem like another just another social hall or private structure standing in the way of a public works project, to us the Seattle Latvian Center truly *IS* Seattle. Countless weddings, confirmations, Youth Congresses, and other special events within the Latvian community have happened there. The Seattle Latvian Center is the largest and most vibrant in the Pacific Northwest, and I personally consider it the most uniquely beautiful Latvian community center in the United States. It is not just a simple social hall, but also a church and Latvian language school for our children. It was built from the ground-up by our fathers and grandfathers and to us, its importance goes beyond the bricks and mortar of the building itself.

This is especially true to our aging community members throughout America. To them their local Latvian community center is home. The Seattle Latvian Center is no different. Having lived through the horrors of World War II and the Soviet Occupation, our elderly population would definitely be the most affected by the loss or relocation of the Latvian Center. It will be recalled that the Soviet Union used eminent domain to make public their homes and possessions. To allow that to happen again, albeit with completely different motives, would no doubt be seen a slap in the face to the elderly Latvian population in Seattle. Our cultural centers embody the decades of work, decades of struggle, and decades of pride within our ethnic community. In Seattle, the Latvian community is vibrant and alive largely as a result of having such a fine facility. For many in Seattle, the Latvian center represents their unique struggle and shows that with grit and perseverance they were able to build a community thousands of miles away from home. The term "negative impact" does not even begin to describe the toll that this project would take on the local Latvian community. The impact on our organization would be the loss of a facility that is integral to the furtherance of our mission.

C-012-034

Accordingly, we request that Sound Transit review each of the alternative routes in the DEIS, and select the one that has the least impact on the activities of the Seattle Latvian Center. To the extent there is an option that allows the Latvian Center to remain in its current location, we respectfully request that such alternative be reviewed and selected, and that any impacts be fully mitigated. The relocation of such a culturally significant facility would have substantial impact on ALJA and would be devastating to the local community in Seattle.

C-012-034

Please see response to C-026-001.

C-012-034

While we understand the need and demand for public transit expansion in the city, our organization, ALJA, on behalf of our members nationwide, urge Sound Transit and the City of Seattle to re-route the proposed railroad to save our largest cultural, educational, and social hub in the Pacific Northwest.

Respectfully yours,



Karlís Lenss
President, American Latvian Youth Association
1777 W Altgeld D
Chicago IL 60614

C-012-035

Please see response to C-015-001.

C-012-036

Please see response to C-015-002.

C-012-037

Please see response to C-015-002.

Pat McCarthy
Sound Transit Board Administration
401 So. Jackson Street
Seattle, Wa. 98104

Dear Ms Pat McCarthy,

C-012-035

We, the members of the Latvian Sorority GUNDEGA, have reviewed the Draft Environmental Impact Statement, attended the community meetings and we are now expressing our deep concern regarding the possible destruction of the Latvian Center and the Church, the cultural pillars of the long standing Latvian and Baltic community. Our sorority members have attended important and historical events at the Church and the Center to meet the presidents of the Baltic countries, to support the UW Baltic study program, to participate in religious services and educational gatherings, as well as to share in ethnic and personal life celebrations. The Church and the Center are the glue holding our organization and our community together, allowing it to grow while preserving Latvian ethnicity and culture. The Latvian sorority tradition dates back to 1920s and remains an important part of the Latvian women's lives across generations. Interrupting or eliminating the access to the Church and the Center would severely disrupt our ability to continue our traditions and share our rich cultural heritage with the city of Seattle.

C-012-036

It is of utmost importance that the Lynwood Link Extension construction allows the continued access to the Center, that the caretaker's house is reconstructed and that there is a minimal long-term disruption to the Center's function due to noise disturbance.

C-012-037

Do not allow the proposed transit line to destroy the Latvian Center, Church and the Latvian community.
We have enclosed our signatures.

Sincerely,

Zaiga Alksne Phillips
The president, Latvian Sorority Gundega
10040 Ne 27th Street
Bellevue, Wa. 98004

C-012-038

Please see response to C-021-001.

EELK SEATTLE KOGUDUS

Seattle Congregation of the Estonian Ev. Lutheran Church

(Services at the **Latvian Lutheran Church**)

Sound Transit, Comments

c/o Lauren Swift

401 Jackson Street

Seattle, Washington 98104

Dear Folks at Sound Transit!

We have just received some most disturbing news: that you are planning to take away the driveway of the Latvian Lutheran Church at Northgate. That would remove any access to that beautiful and essential building, rendering it totally useless! Please, please try to do what you have to do in some other way! Our Estonian Congregation and other cultural organizations have been using that facility for many years!

Thanking you for your consideration,

Sincerely yours,

The Rev. Hendrik Laur, Pastor

C: The Rev. Daira Cilnis

C-012-038

Latvian Evangelical Lutheran Church Abroad

Archbishop Elmārs Ernsts Rozītis
Schelztorstr.25, D-73728 Esslingen
Germany
Tel +49-711-354623
ERozitis@t-online.de

Ms. Pat McCarthy, Chair of the Board
Sound Transit
County—City Building, Room 737
930 Tacoma Avenue South
Tacoma, WA 98402-2100
U. S. A.

August 16th, 2013

Ms. Pat MacCarthy, Chair of the Board, Sound Transit

Dear Ms. McCarthy,

C-012-039

We have learned, with concern, about the probable adverse effects of a proposed train line on our Seattle Latvian Lutheran Church.

This congregation is a key element for us not only in the US Pacific Northwest, but for our Church in general.

The Seattle congregation also is historically significant to our Church. The late archbishop Dr. Kārlis Kundziņš was part of the congregation while the head of the entire Latvian Evangelical Lutheran Church Outside Latvia. Also, my predecessor archbishop Arnolds Lūsis was consecrated here.

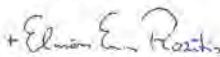
Our Seattle congregation not only provides spiritual care for over 300 members and shelters a school, but its social hall is used for a wide range of religious, cultural and education events.

The Seattle Estonian Lutheran Congregation also has its regular services in the church.

Forcing the congregation from its property, or even compromising its ability to function effectively because of loss of space, or because of noise and vibration, would deal a blow to the community from which it may not recover. Please consider the effects of this on the membership – particularly children, youth and the elderly.

Please choose construction alternatives which would allow this church and community to continue its important work.

Sincerely yours

+ 
+ Elmārs Ernsts Rozītis
Archbishop



C-012-039

Please see response to C-020-001.



BELLEVUE SISTER CITIES ASSOCIATION
P.O. BOX 90012
BELLEVUE, WA 98009-0012

C-012-040

Please see response to C-003-001.

September 4, 2013

Sound Transit
Draft EIS Comments c/o Lauren Swift
401 S. Jackson St.
Seattle WA 98104

Re: Impact on Seattle Latvian Cultural Center

C-012-040

The Bellevue Sister Cities Association, Liepaja, Latvia Committee would like to add its concern to those questioning the present alternatives for the Lynnwood Link Extension DEIS and the serious impact it will have on further use of the Seattle Latvian Cultural Center.

The Seattle Latvian Cultural Center is a focal place, not only for those of Latvian background living in Seattle, but for all of us in the Pacific NW. The Latvian Association was a strong supporter back in 1992 when Liepaja, Latvia became one of Bellevue's sister cities, support that has continued throughout the past twenty years. The Latvian Cultural Center has been the venue for many of our social and informational as well as our fundraising events during this time. We are concerned that the present plans would greatly affect the use of this facility, a huge loss to us, as well as to the many other organizations that use it on a regular basis.

We hope that you will take this into consideration and provide for access to the Seattle Latvian Cultural Center so it can continue as a gathering place for the many people and organizations that presently use it.

Sincerely,

Inta B. Gotelli, BSCA treasurer
Liepaja Committee

cc. Hugh Burleson, BSCA president

YAOJIANG

HUALIEN, TAIWAN

LIEPAJA, LATVIA

SEADNO, CZECH REPUBLIC

C-012-041

Please see response to C-019-001.



World Federation of Free Latvians

400 Hurley Avenue, Rockville, MD 20850-3121 U.S.A.
Tel. (301)340-7646, e-mail: pblaASV@verizon.net

August 29, 2013

Sound Transit
Comments c/o Lauren Swift
401 Jackson St.
Seattle, WA 98104

To whom it may concern:

C-012-041

It has come to our attention that with the extension of the Sound Transit system in the Seattle area the Latvian church and community house may perish. The World Federation of Free Latvians (WFFL), which is the umbrella organization for Latvian communities outside of Latvia, and among whose duties it is to preserve the Latvian heritage - language and culture - as long as possible, hopes that an alternate solution can be found and this particular property will stay unaffected.

The Latvian community in the USA is not a large one and with every passing year, it is more and more challenging for the various Latvian groups to maintain their churches and community centers. The Latvian church and community center in Seattle is particularly important as it is the only one in the state of Washington.

Please give this matter your closest attention and consideration.

Respectfully yours,

Jānis Kukainis
President, WFFL

C-012-042

Please see response to C-016-001.



September 8, 2013

Mežotne, Latvian Children's Language Camp
Inese Graudiņš, Director
3902 San Mar Drive NE
Olympia WA 98506

Sound Transit
Comments c/o Lauren Swift
401 Jackson St
Seattle WA 98104

C-012-042 Having reviewed the Lynnwood Link Extension DEIS, I am very concerned that all of the proposed alternatives will severely impact the Latvian Church and Community Center and the activities of hundreds of families who consider it their „ethnic home”.

As a Latvian language camp for 3 to 14 year olds, Mežotne draws its camp participants, counselors, and staff from the various Latvian communities along the West Coast, predominantly from the Seattle metropolitan area. The Latvian language and knowledge of our heritage is a critical staff requirement in order for the camp to function. Thus the continued existence of the Latvian Church and Community Center is of major importance to our existence as well. This is the place where our families have a common bond, a common history, and a language school for their children.

We are now in the third generation of community members born in the U.S. who are still highly immersed in the language and the culture of Latvia, while being just as involved in their American communities. It takes a great deal of effort, time, and money to live in two parallel cultures, and the Latvian community is doing it! We do not want that jeopardized!

Access to and continued use of the Latvian Church and Community Center during construction and long term operation of the Lynnwood Link Extension without undue noise and access problems needs to be guaranteed so that our community does not lose its continuity, so that we are not displaced by obstacles not under our control.

Respectfully yours,

Inese Graudiņš, Director
Mežotne, Latvian Children's Language Camp
inese@mezonet.net



September 5, 2013

To: Sound Transit
DEIS comments
Lauren Swift

C-012-043

We, members of "United in Art", are extremely concerned about losing our access to the "**Latvian Cultural Center**". It has been our home for many years and a refuge where Latvian artists from the West coast of the U.S. and Canada have organized Art Exhibitions and Artist's Conventions. The intrusion of Light Rail will affect a great number of people other than just artists. The location of the "**Latvian Cultural Center**" is ideal because it is close to I-5 and easily accessible by car, therefore, a large parking area is vital.

We understand that Light Rail will bring a lot of good in the way of transportation to a lot of people, but hopefully, **not at the expense of destroying a whole community**. We are begging you to consider all possibilities in solving the parking problem for the "**Latvian Cultural Center**", in order that all the people who have used the center and enjoyed half a century of educational and recreational activities, may continue to do so.

Yours truly,

United in Art, Secretary

C-012-043

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. See Section 2.5.1 for a description of the refined Segment A alternatives that avoid displacing the church.

The modifications for the project include a realignment of the city street serving the church, which will provide a street meeting current city standards, including sidewalks. The parking area would be modified but Sound Transit anticipates the current levels of parking for the church would be maintained.



Sietlas latviešu bibliotēka
11710-3rd Ave NE
Seattle, WA 98125

C-012-044

Please see response to C-040-001.

September 12, 2013

Sound Transit
Draft EIS Comments c/o Lauren Swift
401 S. Jackson St.,
Seattle, WA 98104

C-012-044

Along with other members of the Washington State Latvian community, I am very concerned about the future of our church and community center because of the impact that the Light Rail extension north to Lynnwood will have on our facility.

We have at the center a library with several thousand volumes of Latvian books and journals. The library serves the entire community: older people who feel the need to read in their native language; younger people who want to learn about Latvian authors and Latvia's history; and children in Latvian school, who are studying the Latvian language and learning about the culture of their parents and grandparents.

The library is a source of reading material for our Latvian Book Club, which meets regularly throughout the year. By donating not insubstantial sums to the Baltic Studies fund each time we meet, the Book Club supports the Baltic Studies program in the Scandinavian Department at the University of Washington. UW officials have consistently expressed their gratitude for the great support from the Latvian community.

Each year our Latvian library ships hundreds of books by Latvian authors living in the west to libraries and schools in Latvia. These books were not available, and indeed forbidden, to readers in Latvia during the 50 years of communist occupation.

If we lose the Latvian Center, the library will cease to exist and our community will be deprived of the strong link to its cultural heritage that books provide. We ask you to do everything possible to let us keep the church and center.

Sincerely,

Dr. Vaira Pelekis-Christopher

Dr. Vaira Pelekis-Christopher

Librarian
Seattle Latvian Community Center



**LETTONIA
STATE OF WASHINGTON ALUMNI
ASSOCIATION**

September 14, 2013
Mukilteo

Sound Transit
Draft EIS Comments
c/o Lauren Swift

I am writing to you on behalf of the 22 current members of Latvian fraternity Lettonia State of Washington Alumni Association. Lettonia uses the Seattle Latvian Community Center several times a year for our chapter meetings and important celebrations, like our annual anniversary of the founding of the fraternity in 1870. More importantly many of Lettonia's members were among the Latvians who volunteered both time and money to build the existing facility at 11710 3rd Avenue NE. Because of the work and money the many Latvian fraternities devoted to the Center, we were granted free use of the Center's facilities. Losing this means we will have to use our membership dues to pay for facilities, rather than donating the money to educational causes, like the Latvian school.

All of us have been or still are active in other groups (church, seniors group, choir, folk dancing, golf association) associated with the center, including in leadership roles in these groups, so we will feel the disruption due to the impacts there too.

We request that the Sound Transit board take into account the needs of the Baltic community that utilizes this facility, find mitigations that will allow the Center to remain in its current location and continue to serve this very unique population.

Eric Raisters

fil! Eric Raisters
Secretary
Lettonia, State of Washington Alumni Association
10507 64th Place West
Mukilteo, WA 98275

C-012-045

Please see response to C-031-001.

C-012-045



To Sound Transit

Sept. 3, 2013

Comments c/o Lauren Swift

401 Jackson Street

Seattle, WA 98104

C-012-046

Our organization has reviewed the Lynnwood Link Extension DEIS and concluded that all the alternatives presented severely impact the Latvian Church and Community Center. Our organization, Fraternitas Metropolitana, relies heavily on this facility for fund raising, meetings and annual holiday celebrations. Any disruptions to its availability, whether temporary or permanent, will either severely disrupt our daily activities or lead to its ceasing to exist because the availability of the facilities guarantee our very own existence.

It is imperative that all construction related impacts to the Center be mitigated in a manner which allows our continued use of this facility during construction and that long term impact resulting from the operation the light rail system be mitigated in a manner allowing our continued use of the facility.


Paul A. Krastins, President

Fraternitas Metropolitana

West Coast Alumni Association Chapter

C-012-046

Thank you for your concerns about the potential displacement of the Latvian Evangelical Lutheran Church. Since the publication of the Lynnwood Link Extension Draft EIS in June 2013, additional engineering was undertaken to reduce adverse effects on the Latvian Evangelical Lutheran Church property and facilities. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained.

Several sections in the environmental document have been updated to address these changes including: Section 2.5.1 describes the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative. Construction of the light rail guideway in proximity to the Latvian Evangelical Lutheran Church would take approximately 1 to 2 years, a longer period for elevated alternatives.

Construction work would predominantly occur between 8 am and 6 pm during weekdays with occasional nighttime and weekend construction. Near-term construction activities would be communicated to adjacent property owners through a proactive community outreach plan and may include newsletters, Internet postings, community meetings, and direct contact by a Sound Transit representative. Reconstruction of the noise wall on the west edge of the church property would require negotiation of a temporary construction easement that would be negotiated prior to the start of construction. Sound Transit's intent is to maintain access to the church and community center for duration of construction, though the access may change somewhat from existing conditions for short periods.



September 11, 2013

Laura Swift
401 S. Jackson Street
Seattle, WA 98104

C-012-048

As members of The Seattle Latvian Evangelical Lutheran Church/Center, and the founding members of the SLGA (Seattle Latvian Golf Association) we would like to express our concerns for the proposed future plans of our center. We have been organizing a golf tournament for the Baltic community over the past 12 years. We have just wrapped up our most recent golf tournament September 7th and participant levels continue to grow. This year tournament was played by 72 golfers with others on a waiting list. Following our golf tournament, golfers and their guests attend an awards banquet and dinner at our Latvian Center. Our tournament is held at Jackson Park Golf Course and the close proximity of the course to our Latvian Center has been instrumental in our continued ability to attract more Latvian golfers and their guests year over year. Our most recent awards banquet was attended by no less than 140 guests and a great time was had by all! Our concern stems from the very importance of our Latvian center being in close proximity to our tournament golf course (Jackson Park). We feel our tournament/awards banquet will lose interest and momentum if the convenience for many Latvian community members (many of them elderly) is altered.

We appreciate the opportunity to express our concerns and await your reply,

Respectfully,

Rolands J. Abermanis

Edmunds Leitis

C-012-048

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.



KURSA
WEST COAST LATVIAN EDUCATION CENTER
P.O. Box 1221
W. 3381 Dayton-Airport Rd., Shelton, WA 98584
www.kursa.com / www.wclec.com / www.latin.org

September 15, 2013

Sound Transit
Draft EIS Comments
401 S. Jackson St.
Seattle, WA 98104

Dear Sirs:

KURSA is the Latvian community's centerpiece school program to connect high school students of Latvian descent to their Latvian language and artistic traditions. It is hosted every year in July at the West Coast Latvian Education Center (WCLEC), a 160 acre camp facility outside of Shelton, Washington. Next summer, the 4 week program will begin its 40th educational year, and the 31st at the WCLEC.

Because of KURSA's length, the planning and preparation already begins in September for the school's opening in July of the following year. The academic program includes classes in language, literature, history, ethics, music and folk dancing. The students have an option in the afternoons to pursue embroidery, ceramics, stain glass and jewelry design with emphasis on integrating traditional Latvian design elements.

As you can imagine, the academic planning is a major undertaking every year, and it takes place at the Latvian Community Center in Seattle at Northgate. The Planning Committee's practise is to meet at least monthly, on Sunday's, after church services. Not only does this facilitate meeting with Latvian Evangelical Lutheran congregation members, but also with members of the Latvian Association of the State of Washington and parents of the Center's Latvian School. It is a convenient and effective way to remain in sync with our community, discuss our planning and seek community support when necessary.

In many ways, what we do as a community is not so unusual. In the Pacific Northwest, we continue to experience reminders of the driving power of language and culture. We see it especially among the Native Americans - from the Tulalip tribe dedicating their new Hibulb Cultural Center in Marysville, Washington, to the Klallam tribe compiling its first dictionary and having it published in 2012 by the University of Washington Press. We see it also in the Scandinavian community in Seattle which has embarked upon a major undertaking to build a new Nordic Heritage Museum with expanded space for its exhibits and cultural programs.

It is, therefore, with trepidation that we ponder the news that the Latvian Community Center may not exist when Sound Transit completes its light-rail from the University District, past Northgate, to Everett. The access which we have to the community through the Latvian Center is invaluable. The loss of the Center sets our community adrift after decades of shaping its character and its cultural life. KURSA's Planning Committee, therefore, urges Sound Transit to carefully review its light-rail options to minimize the impact on a thriving cultural community.

Sincerely yours,

Janis Rogainis, Interim Kursa Director and President of the WCLEC Board

C-012-049

Thank you for your concerns about the potential displacement of the Latvian Evangelical Lutheran Church and for highlighting its significance to the region's Baltic community. Since the publication of the Lynnwood Link Extension Draft EIS in June 2013, substantial additional engineering was undertaken to reduce adverse effects on the Latvian Evangelical Lutheran Church property and facilities. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained.

Several sections in the environmental document have been updated to address these changes including: Section 2.5.1 describes the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative. Compensation also would be provided if the alternative selected for construction would require acquisition of land or improvements as is required by the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970; the Washington State property acquisition policies and procedures in Chapter 8.26 Revised Code of Washington (RCW); and Sound Transit's adopted Real Property Acquisition and Relocation Policy, Procedures, and Guidelines.



WEST COAST LATVIAN EDUCATION CENTER

P.O. Box 1221

W. 3381 Dayton-Airport Rd., Shelton, WA 98584

www.wclec.org / www.wcslc.org / www.sut-l.org

September 15, 2013

Sound Transit
Draft EIS Comments
401 S. Jackson St.
Seattle, WA 98104

Dear Sirs:

The West Coast Latvian Education Center (WCLEC) is a 160 acre camp facility outside of Shelton, Washington. It was founded in 1983 as a non-profit 501(c)(3) corporation for the expressed purpose of fostering Latvian culture through educational activities and events. During July and August, for example, it hosts a heritage camp, „Mezotne“, for children of Latvian descent and „Kursa“, a Latvian language summer school for high school students. The programs attract children and teenagers from the United States and Canada.

Because of the character of the facility, and other Latvian events there in May, June and September, the WCLEC is an extension of the cultural center of the Latvian community in Washington State. That cultural center is the Latvian Community Center in Seattle at Northgate. Built in 1972, it is governed by the Community Center Board, the Seattle Latvian Evangelical Lutheran Church and the Latvian Association of the State of Washington.

These two facilities and their combined cultural and educational activities have shaped, over time, an integrated Latvian community. The Latvian church uses the WCLEC facility to host congregation events, the Community Center's Latvian School sends young people to WCLEC's Latvian camps, and WCLEC sponsored events over Memorial Day, in June and the camping weekend over Labor Day, attract Latvians both young and old to weekends of work, celebration, and just plain recreation in a beautiful wooded facility bordering Armstrong Lake. In parallel, WCLEC uses the Latvian Community Center for monthly business meetings, recruiting volunteers, publicizing WCLEC events and camps, fundraising, hosting a Valentine's Day dinner and movie night, and maintaining rapport with the Latvian community's older generation who were the principal creators, and financial supporters, of both facilities for all these years.

C-012-050

Thus, it is with dismay that the Board of the West Coast Latvian Education Center receives the news that the Latvian Community Center may not exist when Sound Transit completes its light-rail from the University District, past Northgate, to Everett. The loss of the Community Center puts at risk the integrated community we have so painstakingly built since the 1970's, the programs at WCLEC and the outreach to the community which the Center facilitates. The Board urges Sound Transit to carefully review its light-rail options to minimize the impact on a thriving community in this multi-cultural city of Seattle and in Washington State.

Sincerely yours,

Janis Rogainis, Interim Kursa Director and President of the WCLEC Board

C-012-050

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.

September 20, 2013

To the Seattle Sound Transit Board Members,

C-013-001 I am writing regarding the proposed Lynnwood Link extension of the Sound Transit Link Light Rail system which, as currently under discussion, would impact the Seattle Latvian Center and Church at 11710 3rd Ave NE.

Although not a resident of Seattle or Washington State, I can attest that the Seattle Latvian Center serves not only area residents but also Latvian communities in British Columbia and Alberta, Canada. It is the closest active Latvian Center and resource for all of western Canada, and members of our Latvian community have certainly visited there over the years.

As a focal point for area Latvians for many decades, the Seattle Latvian Center enabled and encouraged its members to develop a strong, supportive sense of community with exceptionally viable music, dance and youth groups. These groups branched out by sharing their talents with other communities. Both Alberta and British Columbia have hosted Seattle performers at local Latvian events. The energetic Seattle youth who worked at Latvian summer camp in Shelton, WA, were a highly positive influence on my children, who grew up in a city with a much smaller Latvian population.

I applaud Seattle Sound Transit for striving to improve light rail access for its citizens. I ask that you consider such improvements in a manner that would enhance and maintain the current Seattle Latvian Center and the many communities it serves. In this case, a building is much more than a building. It's the core of a community that extends far beyond its physical boundaries.

Respectfully,

Ena Rudovics
President,
Edmonton Latvian Society "Imanta"
9308 - 82 Street
Edmonton AB T6C 2X5
Canada

C-013-001

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church to the Latvian community in western Canada. See Section 2.5.1 for a description of the refined Segment A alternatives that avoid displacing the church.

West Coast Latvian Song Festival

www.westcoastlatviansongfest.org

10731 Viking Avenue
Northridge, CA 91326
818 366 4972
Berkolds@aol.com

September 20, 2013

Sound Transit DEIS
Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

Dear Sirs:

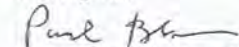
C-014-001

I am writing to express my concern regarding your planned expansion of the Northbound I-5 corridor and the impact it will have on the adjacent community, and specifically the Latvian Community Center at 11710 3rd Ave, Seattle.

The West Coast Latvian Song Festival has been producing events for the Latvian community in the western United States since 1962. Seattle has been the site of numerous festivals which have been attended by thousands of Latvians and Americans from throughout the Americas. The Latvian Center in Seattle has been a cornerstone staging area for most of these activities for the last 40 years. Moving or changing the existing edifice, accessibility or its location would have a severe negative impact on the organizing efforts of our community and would bring into question the feasibility of future festival activities.

I am confident the Latvians support the continued development of mass transit in the greater Seattle area and applaud the city's efforts in this regard. The West Coast Latvian Song Festival Executive Committee strongly urges you to consider developing projects in such a way that do not negatively impact the diverse communities that flourish in Seattle.

With regards,



Dr. Paul Berkolds, Executive Director
West Coast Latvian Song Festival Executive Committee
Los Angeles, CA
(818) 645-8754
berkolds@calarts.edu

C-014-001

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. Please see Section 2.5.1 of the Final EIS for a description of the refined Segment A alternatives that avoid displacing the church.

Studentu Korporācija
GUNDEGA
Seattle's grupa

copy

Pat McCarthy
Sound Transit Board Administration
401 So. Jackson Street
Seattle, Wa. 98104

September 14, 2013

Dear Ms Pat McCarthy,

C-015-001

We, the members of the Latvian Sorority GUNDEGA, have reviewed the Draft Environmental Impact Statement, attended the community meetings and we are now expressing our deep concern regarding the possible destruction of the Latvian Center and the Church, the cultural pillars of the long standing Latvian and Baltic community. Our sorority members have attended important and historical events at the Church and the Center to meet the presidents of the Baltic countries, to support the UW Baltic study program, to participate in religious services and educational gatherings, as well as to share in ethnic and personal life celebrations. The Church and the Center are the glue holding our organization and our community together, allowing it to grow while preserving Latvian ethnicity and culture. The Latvian sorority tradition dates back to 1920s and remains an important part of the Latvian women's lives across generations. Interrupting or eliminating the access to the Church and the Center would severely disrupt our ability to continue our traditions and share our rich cultural heritage with the city of Seattle.

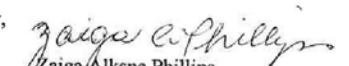
C-015-002

It is of utmost importance that the Lynwood Link Extension construction allows the continued access to the Center, that the caretaker's house is reconstructed and that there is a minimal long-term disruption to the Center's function due to noise disturbance.

Do not allow the proposed transit line to destroy the Latvian Center, Church and the Latvian community.

We have enclosed our signatures.

Sincerely,


Zaiga Alksne Phillips
The president, Latvian Sorority Gundega
10040 Ne 27th Street
Bellevue, Wa. 98004

C-015-001

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. See Section 2.5.1 for a description of the refined Segment A alternatives that avoid displacing the church.

C-015-002

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.

Marisa Way-Requins 11535 Cortiss Ave N Seattle 98133 *Marisa Way-Requins*
 ZALGA A. PHILLIPS 10040 NE 27th ST BELLEVUE 98004 *Zalga A. Phillips*
 INESEC. ABERG 18534 Meridian Ave N Shoreline *IneSec. Aberg*
 Nija Pauda 1741 NE 105th Seattle WA 98125 *Nija Pauda*
 Janija Maties 20126 So. 15th Ave So, SeaTac 98148 *Janija Maties*
 Indra OZOLNIERS 1534 4th St. Kirkland WA. *Indra Ozolniers*
 Uija Hafemann 7610 SE 76th St. Mercer Island WA 98040 *Uija Hafemann*
 Maija Udris-Bitte 4637-129th Lake SE, Bellevue, WA 98006 *Maija Udris-Bitte*
 Maija Kristums 4244-89th Ave SE, Mercer Island, WA 98040 *Maija Kristums*
 Ruta York 14527 SE 183 Street, Renton, WA 98058 *Ruta York*
 Daidra R. UPANS 11515 - 4th Ave. NE, Seattle, WA 98135 *Daidra R. Upans*
 Melissa Finn 15824 SE 170th Street, Renton, WA 98058 *Melissa Finn*
 Simija Phillips 11624 NE 92nd St. Kirkland WA 98032 *Simija Phillips*
 NARUTANATISS PO Box 98765 Red Moines WA 98199 *Narutanatiss*



September 8, 2013

Mežotne, Latvian Children's Language Camp
Inese Graudiņš, Director
3902 San Mar Drive NE
Olympia WA 98506

Sound Transit
Comments c/o Lauren Swift
401 Jackson St
Seattle WA 98104

C-016-001

Having reviewed the Lynnwood Link Extension DEIS, I am very concerned that all of the proposed alternatives will severely impact the Latvian Church and Community Center and the activities of hundreds of families who consider it their „ethnic home“.

As a Latvian language camp for 3 to 14 year olds, Mežotne draws its camp participants, counselors, and staff from the various Latvian communities along the West Coast, predominantly from the Seattle metropolitan area. The Latvian language and knowledge of our heritage is a critical staff requirement in order for the camp to function. Thus the continued existence of the Latvian Church and Community Center is of major importance to our existence as well. This is the place where our families have a common bond, a common history, and a language school for their children.

We are now in the third generation of community members born in the U.S. who are still highly immersed in the language and the culture of Latvia, while being just as involved in their American communities. It takes a great deal of effort, time, and money to live in two parallel cultures, and the Latvian community is doing it! We do not want that jeopardized!

Access to and continued use of the Latvian Church and Community Center during construction and long term operation of the Lynnwood Link Extension without undue noise and access problems needs to be guaranteed so that our community does not lose its continuity, so that we are not displaced by obstacles not under our control.

Respectfully yours,

Inese Graudiņš, Director
Mežotne, Latvian Children's Language Camp
inesegraudins@comcast.net

C-016-001

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. See Section 2.5.1 for a description of the refined Segment A alternatives that avoid displacing the church. Construction of the light rail guideway in proximity to the Latvian Evangelical Lutheran Church would take approximately 1 to 2 years.

Construction work would predominantly occur between 8 am and 6 pm during weekdays with occasional nighttime and weekend construction. Near-term construction activities would be communicated to adjacent property owners through a proactive community outreach plan and may include newsletters, Internet postings, community meetings, and direct contact by a Sound Transit representative. Reconstruction of the noise wall on the west edge of the church property would require negotiation of a temporary construction easement that would be negotiated prior to the start of construction. Sound Transit's intent is to maintain access to the church and community center during construction, although the access may shift as the realigned city street is constructed. Please see the following sections of the Final EIS regarding noise: Section 4.7.3 long term impacts, Section 4.7.4 construction impacts, and Section 4.7.7 for proposed mitigation measures.

185th STATION CITIZEN COMMITTEE

SHORELINE, WASHINGTON

September 10th, 2013

c/o Lauren Swift

401 S. Jackson Street

Seattle, WA. 98104

Dear Sound Transit Board,

On behalf of the 185th Station Citizen Committee (185SCC), I submit the following letter of comment concerning the Draft EIS report Sound Transit prepared for the Lynnwood Link Extension project.

The 185th Station Citizen Committee is a neighbor-led community group that helps to educate our neighborhoods about Sound Transit's plans; serves as a public forum to discuss the ramifications of these plans on our area; and then in turn functions as a liaison to Sound Transit to present our community's concerns, issues, and priorities. For the last year 185SCC has been working with the City of Shoreline, Futurewise and Senior Services to educate and collect public input comments about the design of the 185th Street Station and surrounding station-area. The comments listed in this letter reflect comments collected during three community visioning meetings, monthly public meetings, and four public outreach events.

The 185SCC commends the work that Sound Transit has conducted for the last two years resulting in the Lynnwood Link Extension DEIS.

C-017-001 As residents of the surrounding neighborhoods, we stand ready to embrace, work for, and support the creation of an integrated station area which fully connects and complements our neighborhood. Unfortunately, in reviewing the Lynnwood Link DEIS, we are greatly concerned by some of the options and details outlined. In broad terms, it would seem that the City of Shoreline is being asked to accommodate a large Park & Ride facility for a commuter railroad. While we recognize that one of the goals of Sound Transit's Light Rail system is to meet the needs of commuters, this is not its only use, nor the only goal identified by the Sound Transit Board. The station needs to support, and be oriented towards, the community; just as much as the community is ready to support the station.

C-017-001

The proposed parking facility at the NE 185th Street site was developed considering the project's objectives of good multi-modal connections to fast, frequent and reliable two-way transit service serving the corridor communities. The 500-space parking garage would be one element of access for a station expected to serve 6,600 daily riders, most of which are expected to be coming from the surrounding community via transit, biking or walking. Other proposed stations for the corridor at about 2 mile intervals also help distribute the need for parking. The overall station site for the Preferred Alternative features a parking garage that is adjacent to and west of I-5 and across the freeway from the station area. Other alternatives include a parking garage to the east of I-5, adjacent to the station. Sound Transit has also worked closely with the City of Shoreline, which has undergone its own station planning study and environmental review focusing on the areas surrounding the station.

We advocate for a complete and connected community around the future Link light rail station along I-5 at NE 185th Street. In general, we as a community have three goals for the final design of the 185th Street Station.

C-017-002 I. PUBLIC SAFETY & ACCESSIBILITY

First and foremost we want to ensure the safety of our neighbors and fellow travelers by prioritizing pedestrian, transit connectivity, and bicycle access to the station. We recognize that optimizing pedestrian access will also require an analysis of the transit stops surrounding the station to ensure maximum ridership. Studies show that out-of-vehicle waiting experience at transit stops can be even more important than in-vehicle experience ⁽¹⁾.

C-017-003 II. TRANSIT-ORIENTED DEVELOPEMNT

Secondly, we want to increase the potential for transit oriented development (TOD) surrounding this station. Following Sound Transit's TOD policy, the station's conceptual design was analyzed 5 months ago to determine the potential for TOD, and it was found to be "limited" rising only to "moderate" assuming that a nearby landholder (Shoreline Schools) eventually transfers the property to be re-developed. This seems like a faulty assumption, since the presence of a light rail station is bound to encourage increased residential density and might require the school district to utilize its North City Elementary property. Most of the details proposed in the DEIS do not follow the Sound Transit Board's guidance to facilitate TOD strategies on its own property and in areas around its transit facilities ⁽²⁾.

III. STATION DESIGN

Finally, we want to minimize the visual and audible impact of the trains for the surrounding residential neighborhoods. We also wish to have a station that is inviting, serves as a focal point of our neighborhood, and reflects our community's cultural diversity.

C-017-004 The Draft EIS lays out 3 conceptual design options for the 185th Street Station and we strongly prefer the specific design features listed below:

C-017-002

Access to the proposed light rail stations for non-motorized users and feeder bus lines is described in Section 3.2 of the Final EIS. Features include pedestrian and bicycle access to and from feeder bus lines, park-and-ride facilities, and surrounding streets. Each station would include bicycle storage. Section 2.5.1 of the Final EIS describes factors affecting the range of alternatives, one of them being the maximization of existing transit infrastructure. Analysis of the existing regional transit including service characteristics, ridership, and travel times; transit level of service; and local and sub-regional transit is provided in Section 3.1.2. Section 3.2.2 provides an overview of long-term impacts to regional transit.

C-017-003

The Draft EIS considered TOD potential in the comparison of alternatives and impacts analysis, particularly in the assessment of potential indirect impacts related to the project. As noted in your letter, Sound Transit's TOD policy states that the agency will assess TOD during project development to help determine the potential for future development in and around a proposed station location. Assessments were conducted at all proposed station locations based on existing conditions. When the assessment was conducted for the Draft EIS, zoning around the NE 185th Street Station was primarily single-family residential. Shoreline has subsequently conducted a station area planning and environmental review process for the area, examining potential changes in the types of development that could be allowed in the station area, with the city's final plan updates occurring in 2015. For the Final EIS, Sound Transit updated the TOD report, which is available on the project web site. Implementation of TOD policy continues through final design, construction, and post construction. Implementation includes identifying TOD opportunities and strategies as well as partnerships with public and private interests as noted in Section 4.2.4 of the Draft EIS.

C-017-004	<ul style="list-style-type: none"> We strongly prefer the at-grade train tracks and center platform design shown in Option 1. The vast majority of the public input we've collected in relation to track design preferred the at-grade option.
C-017-005	<ul style="list-style-type: none"> When Sound Transit rebuilds the NE 185th St Bridge to install at-grade tracks (as shown in Option 1), enhanced pedestrian, bike and transit access should be prioritized. This should include covered walkways, bike lanes, and dedicated transit lanes. Encourage pedestrian safety and access by building sidewalks to/from the station.
C-017-006	<ul style="list-style-type: none"> Add appropriate traffic control devices and/or design elements to promote safety for commuters, neighborhood residents, and vehicles at the redesigned intersection of NE 185th St and 5 Ave NE (as shown in option 1). Transit access loop turning into the station from 8th Ave NE and exiting the station via NE 185th St (as shown in Option 1).
C-017-007	<ul style="list-style-type: none"> Parking garage to be located on the West side of I-5 along NE 185th St (as shown in Option 1).
C-017-008	<ul style="list-style-type: none"> Reconfigure the station site (as shown in Option 1) to maximize potential Transit-Oriented-Development (TOD) immediately adjacent to the station. <ol style="list-style-type: none"> Move the bioretention cells currently located in the "Landscaped Area" if possible. Move service vehicle parking & ancillary buildings (locate south of/under the 185th St Bridge?) if possible. Rather than include a large (.75 acre) blank "Landscaped Area" next to the station, design to include a smaller town-square type public space-point to allow more room, and a focus for TOD. Enhance potential TOD development by designing station "overbuild" to provide commercial and/or community space above the station. Besides allowing the best possible integration of the station with local businesses, this would further shield the neighborhood from the sights and sounds of the highway and light rail.
C-017-009	<ul style="list-style-type: none"> Include architectural and artistic elements to the station building and surrounding area to create a station with an aesthetic and 'personality' that reflect our community's cultural diversity. For instance, one suggestion that

C-017-004

Your preference for Option 1 for the NE 185th Street Station design is noted.

C-017-005

Section 2.4 of the Final EIS describes the typical features of light rail alternatives, including accommodations for pedestrians, bicyclists, and feeder bus services at light rail stations. Section 2.2 of the Final EIS has updates for the Preferred Alternative. Section 3.2 of the Final EIS discusses features of the proposed project as it relates transit features and non-motorized facilities, and describes the effects that are associated with the different alternatives. Further details are shown in the Conceptual Plans (Appendix F) and the *Transportation Technical Report*, both provided on CD with the Draft and Final EIS and available on the project website.

C-017-006

Thank you for your comments and recommendations for improved circulation and safety near the NE 185th Street Station. Design for the NE 185th Street Station area would include intersection traffic control to manage the many travel modes and access to the station.

C-017-007

Your preference for Option 1 is noted.

C-017-008

Thank you for your comment regarding transit-oriented development (TOD). Overbuilding of a station or parking garage to provide development opportunities involves a number of trade-offs. As you mentioned, the option to develop the stations in this way is allowed in Sound Transit's TOD Policy, and the current designs do not preclude the opportunity. Sound Transit will consider a joint development project if a

- C-017-009** | we received from the Korean community was to add a contemporary Korean pagoda roof top to the design.
- C-017-010** |
- Our neighborhood prizes its many green spaces, and especially its trees. In designing the station, re-location of streets and services, and organizing the construction at the site we encourage Sound Transit to preserve as many of our mature trees as possible, and to re-plant the areas disturbed to restore and maintain our 'urban forest'.
- C-017-011** |
- Consider shifting the station (as shown in Option 1) towards the south approximately 150 feet, partially "under" the 185th St Bridge so east bound pedestrian and bicycle traffic on NE 185th St can access the station via an escalator. This would decrease the amount of vehicles making left turns into the station, and significantly reduce the number people needing to use the crosswalk across NE 185th St - a busy arterial that will become more congested with the opening of the station.

Thank you for your consideration. We look forward to working with Sound Transit and representing the needs of our community as the design process for the 185th Street Station moves forward. We accept that great changes are coming to our neighborhoods with the arrival of Light Rail, and we understand that many more commuters will begin travelling through our community. However, as the future neighbors of a Sound Transit Station we remain dedicated to the idea that this must be much more than a commuter-centric park-and-ride. We need you to work with us so that this station will be a vital community hub as part of the entire regional public transit system. It is what our neighborhood demands and deserves. We hope that together with Sound Transit and the City of Shoreline we can create a truly great station, station area, and transit-oriented neighborhood.

Sincerely,



Suzanne Wynne
Co-Chair, 185th Station Citizen Committee

References:

- 1) http://www.transitwiki.org/TransitWiki/index.php?title=Pedestrian_connections
- 2) <http://www.soundtransit.org/Documents/pdf/about/board/resolutions/2012/Reso2012-24-Attachment%20A.pdf>

number of conditions are met, including having an interested development partner. Currently, there have been no proposals from parties interested in joint development at the Lynnwood Link Extension stations, but Sound Transit will continue to investigate possibilities.

C-017-009

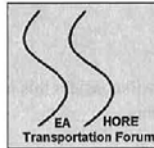
In Section 4.5.2 of the Draft EIS, it states that Sound Transit would develop design criteria with input from local jurisdictions and WSDOT; and Sound Transit would adhere to the local jurisdiction's design standards in station areas, if applicable, to promote visual unity in these areas.

C-017-010

Sound Transit will comply with all applicable tree protection standards in City of Shoreline Municipal Code 20.50 Subchapter 5. Sound Transit would minimize vegetation clearing, as noted in Section 4.8.6 of the Draft EIS.

C-017-011

In the Final EIS, all alternatives include a station at NE 185th Street to the north. Because siting of a station requires a straight track, an alignment south of NE 185th Street is infeasible. The Final EIS Chapter 2 has more detail on the Preferred Alternative.



September 12, 2013

Ms. Lauren Swift
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Lynnwood Link Draft Environmental Impact Statement

Dear Ms. Swift:

On behalf of the SeaShore Transportation Forum, an advisory board of elected officials from Seattle, Shoreline, Lake Forest Park, Kenmore, Bothell, Woodinville, Edmonds, Mountlake Terrace, King County, and Snohomish County, we are writing to provide our input on the station locations being considered for Sound Transit's Lynnwood Link extension as part of the Draft Environmental Impact Statement (DEIS). Several of our member jurisdictions have already provided input, but we wanted to add our comments that reflect our mutual positions.

C-018-001

The SeaShore Transportation Forum supports stations at 145th and 185th, and suggests that Sound Transit should give strong consideration to an additional station at 130th if the funds are available. In addition, the SeaShore Transportation Forum supports the eastern alternative for the Mountlake Terrace station over the freeway alternative.

C-018-002

In addition to support for these station locations, we want to emphasize the importance of providing access to transit, including local bus feeder service and enhanced bicycle and pedestrian facilities to improve the transfer experience. We strongly encourage Sound Transit and its transit partners to look at the entire system when making decisions such as where to locate parking facilities and the requisite size of the facilities with the goal of improved access for all modes and reduced congestion near the stations. Transit oriented development at key station locations should also be considered as a way to increase access to transit.

C-018-001

Your preference for stations at NE 145th Street and NE 185th Street, and support for further consideration of a station at NE 130th Street is noted. In November 2013, the Sound Transit Board identified an at-grade and elevated alignment with stations at NE 145th and NE 185th streets (Alternative A1 with modifications) as the Preferred Alternative in Segment A. The Board also directed further study of options to add a station at NE 130th Street or to make provisions for a future station. The Sound Transit Board identified an elevated station crossing over NE 236th Street east of I-5 as the station alignment for the Preferred Alternative in Segment B. The freeway station remains part of Alternative B4. The 130th Street Station remains part of the other A alternatives (A5, A7, A10, A11) aside from the Preferred Alternative.

C-018-002

Sound Transit designed the project to provide good access for all modes, and worked with local jurisdictions and transit agencies to identify effective station sites and access plans for the proposed alternatives. Access to the proposed light rail stations for non-motorized users and feeder bus lines is described in Section 3.2 of the Draft EIS. Features include pedestrian and bicycle access to and from feeder bus lines, park-and-ride facilities, and surrounding streets. Each station would have bicycle storage. Section 2.6.1 of the Draft EIS describes factors affecting the range of alternatives, one of them being the maximization of existing transit infrastructure. Analysis of the existing regional transit including service characteristics, ridership, and travel times; transit level of service; and local and sub-regional transit is provided in Section 3.1.2. Section 3.2.2 provides an overview of long-term impacts to regional transit.

Implementation of TOD policy continues through final design, construction, and post construction. Implementation includes identifying

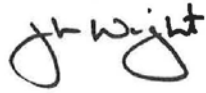
TOD opportunities and strategies as well as partnerships with public and private interests as noted in Section 4.2.4 of the Draft EIS.

Ms. Lauren Swift
September 12, 2013
Page 2

We hope that the Sound Transit Board will consider this input as it makes decisions about station locations and related transit improvements.

Thank you for your consideration.

Sincerely,



John Wright
Councilmember
Lake Forest Park
Co-Chair
SeaShore Transportation Forum



Chris Eggen
Deputy Mayor
Shoreline
Co-Chair
SeaShore Transportation Forum

cc: SeaShore Forum members
Governor Jay Inslee



World Federation of Free Latvians
400 Hurley Avenue, Rockville, MD 20850-3121 U.S.A.
Tel. (301)340-7646, e-mail: pblaASV@verizon.net

August 29, 2013

Sound Transit
Comments c/o Lauren Swift
401 Jackson St.
Seattle, WA 98104

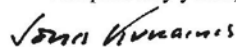
To whom it may concern:

C-019-001 It has come to our attention that with the extension of the Sound Transit system in the Seattle area the Latvian church and community house may perish. The World Federation of Free Latvians (WFFL), which is the umbrella organization for Latvian communities outside of Latvia, and among whose duties it is to preserve the Latvian heritage - language and culture - as long as possible, hopes that an alternate solution can be found and this particular property will stay unaffected.

The Latvian community in the USA is not a large one and with every passing year, it is more and more challenging for the various Latvian groups to maintain their churches and community centers. The Latvian church and community center in Seattle is particularly important as it is the only one in the state of Washington.

Please give this matter your closest attention and consideration.

Respectfully yours,


Jānis Kukainis
President, WFFL

C-019-001

After the publication of the Draft EIS, the Sound Transit Board subsequently directed Sound Transit to explore a Preferred Alternative that would avoid displacing the church. The Final EIS describes the results of additional engineering Sound Transit undertook to avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained, although a small portion of land on the property's edge would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property, but an elevated design by the church is not the Preferred Alternative.

Several sections in the Final EIS have been updated to address these changes including: Section 2.5.1 describing the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

Latvian Evangelical Lutheran Church Abroad

Archbishop Elmārs Ernsts Rozītis
Schelztorstr.25, D-73728 Esslingen
Germany
Tel +49-711-354623
ERozitis@t-online.de

Ms. Pat McCarthy, Chair of the Board
Sound Transit
County – City Building, Room 737
930 Tacoma Avenue South
Tacoma, WA 98402-2100
U. S. A.

August 16th, 2013

Ms. Pat MacCarthy, Chair of the Board, Sound Transit

Dear Ms. McCarthy,

C-020-001

We have learned, with concern, about the probable adverse effects of a proposed train line on our Seattle Latvian Lutheran Church.

This congregation is a key element for us not only in the US Pacific Northwest, but for our Church in general.

The Seattle congregation also is historically significant to our Church. The late archbishop Dr. Kārlis Kundziņš was part of the congregation while the head of the entire Latvian Evangelical Lutheran Church Outside Latvia. Also, my predecessor archbishop Arnolds Lūsis was consecrated here.

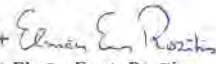
Our Seattle congregation not only provides spiritual care for over 300 members and shelters a school, but its social hall is used for a wide range of religious, cultural and education events.

The Seattle Estonian Lutheran Congregation also has its regular services in the church.

Forcing the congregation from its property, or even compromising its ability to function effectively because of loss of space, or because of noise and vibration, would deal a blow to the community from which it may not recover. Please consider the effects of this on the membership – particularly children, youth and the elderly.

Please choose construction alternatives which would allow this church and community to continue its important work.

Sincerely yours

+ 
+ Elmārs Ernsts Rozītis
Archbishop



C-020-001

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes including: Section 2.5.1 describing the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations. Section 4.7.3 of the Final EIS discusses noise and vibration impacts and Section 4.7.7 describes the proposed mitigation measures that would be applied.

EELK SEATTLE KOGUDUS

Seattle Congregation of the Estonian Ev. Lutheran Church

(Services at the **Latvian Lutheran Church**)

Sound Transit, Comments

c/o Lauren Swift

401 Jackson Street

Seattle, Washington 98104

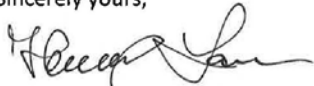
Dear Folks at Sound Transit!

C-021-001

We have just received some most disturbing news: that you are planning to take away the driveway of the Latvian Lutheran Church at Northgate. That would remove any access to that beautiful and essential building, rendering it totally useless! Please, please try to do what you have to do in some other way! Our Estonian Congregation and other cultural organizations have been using that facility for many years!

Thanking you for your consideration,

Sincerely yours,



The Rev. Hendrik Laur, Pastor

September 11, 2013

C: The Rev. Daira Cilnis

C-021-001

The Sound Transit Board directed Sound Transit to explore a Preferred Alternative that would avoid displacing the church. The Final EIS describes the results of additional engineering that Sound Transit undertook to avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained, although a small portion of land on the property's edge would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property, but the existing roadway access would remain in place.

Several sections in the Final EIS have been updated to address these changes including: Section 2.5.1 describing the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.



Seattle Estonian Society
3010 North 24th Street
Tacoma, WA 98406

September 19, 2013

Sound Transit
401 South Jackson Street
Seattle, WA 98104

Dear Transit Board:

Please do all you can to preserve the dignity of the Latvian Community Center and Church. We respectfully request that the Latvian Center remain at its present location and that it remain accessible to the Baltic community during link construction.

C-022-001

The Latvian Center serves as the heart of the Baltic community in the Seattle area. The Center is where we come to:

- Celebrate our heritage and teach our children the Estonian, Latvian, and Lithuanian languages;
- Give back to our community by raising funds for the University of Washington Baltic Program (one of only a handful of University programs in the United States that teaches Estonian, Latvian, and Lithuanian languages, literature, and culture);
- Honor our fallen veterans who fought for independence in Estonia, Latvia, and Lithuania against the Soviets;
- Honor our veterans who fought in Korea (most not yet citizens), Vietnam, and the Gulf Wars; and Afghanistan;
- Welcome newly minted U.S. citizens who have immigrated from Estonia, Latvia, and Lithuania, helping them to acclimate to the United States;
- Remember the thousands forcibly deported to Siberia, many never to return to their native land;
- Host visiting dignitaries, notably the Presidents of and Ambassadors from Estonia, Latvia and Lithuania (the Latvian Center is no stranger to Secret Service agents conducting security sweeps);
- Celebrate christenings and weddings, and mourn our fallen friends.

Looking back to our homelands is not an exercise in history; many members of our Estonian, Latvian, and Lithuanian communities are first generation immigrants who know what it means to have their homeland stolen by the Soviets, fight for that homeland, and live to see it independent once again.

The Seattle Estonian Society, which represents Estonians across Washington State, but has the greatest proportion of members in Seattle, earnestly requests that you consider the reverberating consequences of closing the Latvian Community Center. We respectfully request that the Latvian Center remain at its present location and that it remain accessible to the community during link construction.

In hope of a positive response,

Ene Kristi Urv-Wong
President
Seattle Estonian Society

cc: IW
DPK

C-022-001

Thank you for your comments describing the cultural importance of the Latvian Evangelical Lutheran Church. Please see Section 2.5.1 of the Final EIS for a description of the refined Segment A alternatives that avoid displacing the church.

Sound Transit
Draft EIS Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

September 23, 2013

Delivered via email to: LynnwoodLinkDEIS@soundtransit.org

RE: Parkwood Neighborhood Association Comments on the Draft EIS for the Lynnwood Link Extension

Dear Ms. Swift,

The Parkwood Neighborhood Association is pleased to have the opportunity to submit these comments on the Draft Environmental Impact Statement for the Lynnwood Link Extension. The location of Shoreline's Parkwood Neighborhood on the west side of I-5 (opposite the proposed light rail line but within close proximity to both the 145th and 155th proposed stations) means that our neighborhood would experience few direct impacts from the physical placement of either station and the light rail line on the east side of I-5, but could be subject to indirect impacts to traffic, mobility (walking, biking, and bus transit), schools, Twin Ponds Park, and the natural environment. With these factors in mind, we have focused our review of the Draft EIS and our comments by identifying potential impacts to the Parkwood Neighborhood from the stations proposed at 145th and 155th streets.

C-023-001 **Traffic Impacts:** Both stations would increase traffic and local street congestion in our neighborhood during peak commute times. Parkwood Elementary School is located on the south side of N. 155th St. (at Wallingford Ave. N) within one-half mile of the proposed 155th station. Increased traffic on 155th is a safety concern for our students at pedestrian crosswalks located at Meridian Ave. N and at Wallingford Ave. N and also for bus and parent drop-off/pick-up traffic at the school. In addition, the 20 mph speed limit on 155th within the school zone would cause backups and increase traffic congestion for commuters heading to and from the 155th Station during portions of the morning commute that overlap with the beginning and end of the school day. School crossing guards and a lighted crosswalk currently stop traffic for students crossing at 155th and Wallingford in front of the school. This busy crossing would further delay commuter traffic to and from the 155th station and increase the risk to students crossing at this intersection. Adding a traffic signal at Wallingford might improve pedestrian safety but may not ease congestion on 155th and may prove to be problematic because of the steep hill and poor sight distance on 155th. In contrast, a station located at 145th would avoid these traffic impacts because the posted speed limit is 35 mph, and the entrance to Lakeside School is off of 1st Ave NE in Seattle.

Our familiarity with neighborhood traffic patterns suggests that both the 145th and the 155th stations would increase traffic on both Meridian Ave. N and on 1st Ave. NE as commuters seek out neighborhood streets for routes to the north and south. The 155th station could result in more traffic impacts to Meridian Ave. N and to 1st Ave. NE because there are no freeway ramps at

C-023-001

Traffic impacts and multi-modal conflicts were addressed in the Draft EIS and updated in the Final EIS. The Sound Transit Board identified the NE 145th Street Station as part of the Preferred Alternative rather than the NE 155th Street Station, although the Final EIS continues to evaluate all of the alternatives. The Sound Transit Board will ultimately determine the alternative to implement and the project to be built after the Final EIS has been issued.

- C-023-001** 155th like there are at 145th. The Evergreen Elementary School is located on Meridian Ave. N between 145th and 155th and is already a source of traffic congestions on Meridian due to student traffic and the 20 mph speed limit when school is in session. We are concerned that both station locations would add to the existing traffic congestion on Meridian and compromise the safety of Evergreen students. Regardless of which station is chosen, Impacts to Meridian Ave. N and 1st Ave. NE will require careful consideration and possible mitigation. It helps put the potential traffic impacts on the schools and local roads in perspective by considering that the anticipated boardings at the 155th station (and the increase in people moving through our neighborhood) is about twice the combined student body population of the Parkwood and Evergreen elementary schools (700 students) that are an existing source of traffic congestion. A station at 155th would essentially add the traffic of two more elementary schools to our neighborhood.
- We feel that a station located at 145th would result in fewer traffic impacts to our neighborhood than a station located at 155th because 155th lacks freeway ramps and because 145th is a major arterial with four lanes of traffic and higher speed limit. Most traffic on 155th is currently local and not tied to I-5. In contrast, 145th is used for both local, cross-town traffic and for access to I-5. Presumably some of the commuter traffic on 145th bound for I-5 would instead go to the 145th station or be replaced by public transit, biking, and walking. Traffic volumes on 145th are considerably higher than 155th, so any increase in traffic on 145th caused by a light rail station there would be relatively less compared to the increased traffic on 155th caused by a station at 155th. In addition, 145th is better suited for a station because the road provides better eastward connectivity to communities located beyond Lake City Way, whereas 155th ends at 15th Ave. NE and forces eastbound traffic to split north and south around Fircrest and Hamlin Park.
- C-023-002** Regardless of the station location, the station design should discourage automobile use (by constructing smaller parking garages than proposed in the Draft EIS) and encourage infrastructure improvements that favor alternative means of transportation such as bus, bikes, and walking. Because the City of Seattle has prohibited a parking structure at the 130th station, a 500- to 650-car parking garage at 145th would draw more vehicles to Shoreline's 145th station under Alternatives A10 and A11 (which also include a station at 130th). We prefer smaller parking garages at the Shoreline stations to reduce vehicle traffic on our neighborhood streets, reduce property acquisitions in the Ridgecrest neighborhood, and to preserve the character and safety of our neighborhoods. The station designs should also consider the potential for increased cut-through traffic on residential streets and mitigate these impacts with traffic-calming or other measures. In particular, we are concerned about cut-through traffic on N 147th and N 148th streets between 1st Ave. NE and Meridian Ave. N. for a station located at 145th and cut-through traffic on Corliss Ave. N and N 160th St. for a station located at 155th.
- C-023-003**
- C-023-004** **Pedestrian and Bike Accessibility:** Both the 145th and 155th stations will increase pedestrian and bicycle activity in the Parkwood Neighborhood, which are more desirable modes of travel than vehicular traffic and the parking facilities that would be needed for cars. Bicycle access to the 145th station location is currently poor due to a lack of existing bike facilities in the area, the dangerous sidewalks and limited right of way along 145th, and the poor connectivity of neighborhood streets imposed by I-5 and the hilly topography. Although future bike facilities

C-023-002

As described in Section 2.3 of the Final EIS, station access is intended to serve a variety of user types including non-motorized users, those commuting by automobile, and those arriving on bus. Park-and-ride spaces are part of a balanced approach to access, and they can help minimize parking impacts to neighborhoods while providing access to light rail for areas transitioning from suburban to urban densities. Consistent with its adopted System Access Policy, Sound Transit will continue to refine the station access plans for the project during final design.

C-023-003

In the areas that you reference, the potential for cut-through traffic may exist with or without the light rail project and parking garages. Along N 145th Street, the potential would be related to how existing signals operate (and where left-turn pockets are available) for southbound traffic accessing N 145th Street; as well as the reverse movement, i.e., northbound traffic from N 145th Street accessing Meridian Avenue. General traffic could seek cut-through routes between these two points, not just light rail station traffic. Likewise, the second location noted on Corliss at N 160th is a location with a pre-existing issue related to cut through traffic.

At NE 148th Street between 5th and 8th Avenues, near the 145th Street station, there is the potential for cut through traffic more directly related to station traffic.

In Section 3.6.4, the EIS notes that in areas where cut-through traffic due to the stations may occur, signage as well as more active calming treatments could be considered, and Sound Transit would coordinate with the City to determine the most appropriate measures.

- C-023-004** connecting to 145th are planned by the City of Shoreline on Meridian Ave. N and 5th Ave. NE, safe access for pedestrians and cyclists from these streets to the 145th station would need to be provided along 145th, where sidewalks are dangerously narrow and lack any sort of buffer from four lanes of 35-mph traffic. Creating space for pedestrian and bike facilities along 145th would need to consider a road diet, property acquisition, or a combination of both. Alternatively, east-west bicycle traffic could be routed one block north and south of 145th to neighborhood streets converted to greenways with safer east-west connectivity to regional bike facilities. Both options would require widening the sidewalk on the north side of the 145th overpass at I-5 or adding a new pedestrian/bike bridge over I-5 to replace the dangerously narrow sidewalk. In lieu of improvements to 145th, Parkwood residents that choose to bike or walk to the 145th station might be best served by a pedestrian and bicycle trail that parallels the west side of the southbound I-5 exit ramp and connects with the east end of NE 147th St. and leads safely to bike facilities and sidewalks along 1st Ave. NE and established bike facilities along 155th (which connects with the Interurban Trail). This trail could also be extended south, combined with the partial daylighting of Thornton Creek behind Aegis, and connected to the trail through Twin Ponds Park.
- C-023-005** **Twin Ponds Park:** Both stations would increase traffic on 1st Ave. NE and impact the character of Twin Ponds Park and the park amenities. Parking along 1st Ave. NE is already at capacity during soccer games and is a safety concern with vehicle loading and unloading along the road. Increased traffic on 1st Ave. NE would also impact the safety of senior residents from Aegis that periodically cross the street to visit Twin Ponds Park. Parking restrictions would need to be imposed at the park to prevent overflow parking from a station located only one block away on 155th. Regardless of which station is selected, sidewalks should be extended along the entire length of 1st Ave. NE from 145th to 155th to increase walkability to the light rail station and pedestrian safety. More crosswalks and a lighted, pedestrian-activated crosswalk on 1st Ave. NE would address some of these safety concerns.
- C-023-006** **Natural Environment:** As indicated previously, daylighting portions of Thornton Creek along a new pedestrian and bike trail west of the freeway would encourage mobility to either station while improving aquatic and riparian habitat and providing a natural amenity for the residents of Parkwood. Pedestrian use of the existing trail through Twin Ponds Park from Meridian Ave. (across from the Evergreen School) might also increase under either station option. Widening, lighting, and other improvements to this trail would encourage walking to either station. Extending a new trail spur eastward to 1st Ave. NE south of the ponds would also encourage walking to the 145th station.
- C-023-007** **Summary:** Based on a consideration of both the impacts and the benefits of the Segment A Alternatives, the majority of the Parkwood Neighborhood Association Board favors a station located at NE 145th Street. Alternatives A1 and A3 (145th station) would result in similar impacts to Parkwood, and so we do not strongly favor one of these alternatives over the other. Alternatives A10 and A11 (Stations at 130th and 145th) could result in fewer impacts to Parkwood due to reduced boardings anticipated at 145th relative to other alternatives; however, the station footprint at 145th would be comparable to Alternatives A1 and A3. Consequently, we do not have a strong preference for Alternatives A10/A11 over Alternatives A1/A3. Alternatives

C-023-004

The streets reconstructed with the project would meet applicable city standards, which typically include sidewalks providing for pedestrian and bicycle use; station access plans also are considering all modes of access, including bicycling and walking. The Draft EIS Transportation Technical Report includes an inventory of pedestrian facilities within 1/2 mile of stations and bicycle facilities within 1 mile of stations. This inventory helped Sound Transit work with local jurisdictions on pedestrian and bicycle access planning in the station areas.

C-023-005

The NE 155th Street Station is one of the alternative station locations with the lowest forecasted ridership and therefore one of the lower pedestrian volume estimates. The estimated future PM peak hour period volume leaving the NE 155th Street Station is estimated at approximately 40 pedestrians per hour, based on the ridership forecasts (other riders are assumed to transfer to bus or are park-and-ride patrons). The pedestrians will primarily walk to the east and west from the station. While many pedestrian amenities are desirable near stations, the volume at the NE 155th Street Station is not anticipated to result in an impact to existing facilities.

The station garage is expected to accommodate the projected demand for park-and-ride; however, if the demand for transit increases, it is possible that all day parking of transit riders could occur where on-street parking is available within walking distance of the station. Section 3.6.7 of the EIS identifies measures that could be applied to discourage parking by transit users in the station areas. For example, signs restricting parking duration could be installed at Twin Ponds Park and along 1st Avenue NE.

C-023-006

Sound Transit appreciates your suggestions for park, trail and other

C-023-007 | A5 and A7 (155th station) would have the greatest adverse impact on the Parkwood neighborhood while not serving local transit needs as much as other stations because the low anticipated boardings.

The Parkwood Neighborhood Association appreciates the opportunity to comment on the 145th and 155th station alternatives for the Draft Environmental Impact Statement for the Lynnwood Link Extension. We welcome Light Rail to the community because of the many benefits it will provide long into the future. We encourage Sound Transit to work the cities of Seattle and Shoreline and King County Metro Transit to encourage walking, biking, and bus transit over cars to get people to and from the stations. The Parkwood Neighborhood Association is committed to working with Sound Transit and the City of Shoreline to identify potential impacts to our neighborhood and to work collaboratively toward solutions that best serve the needs of our community.

Sincerely,

Chris Brummer, Parkwood Neighborhood Association Light Rail Committee Chair
Katie Schielke, Parkwood Neighborhood Association Chair

neighborhood amenities that could complement the regional investment in a light rail station serving the area. However, such improvements are beyond the scope of the proposed project.

C-023-007

Thank you for your comments on the Lynnwood Link Extension Draft EIS. Sound Transit acknowledges your preference for a station at NE 145th Street and your discussion of the pros and cons associated with the Segment A station alternatives. The Final EIS evaluates all the alternatives evaluated in the Draft EIS (with updated analysis when needed). The Final EIS also evaluates the Preferred Alternative the Sound Transit Board identified in November 2013, with a station at NE 145th Street.

Sound Transit
DEIS Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

September 22, 2013

Dear Ms. Swift,

I am writing to you as a representative of the 145th/155th Street Station Citizens Committee. We are a group of neighbors who have recently formed to share information and ideas about the coming light rail and to be involved as much as we can in the process of reshaping our part of Shoreline. We all live in the Ridgecrest or Parkwood neighborhoods, both of which stand to see significant changes as a result of the light rail station. We are excited at the thought of rapid transit at our doorsteps, yet at the same time we have many concerns and questions about how it will affect our neighborhoods. Thank you for the opportunity to provide feedback on the Lynnwood Link Extension Draft Environmental Impact Statement.

Though not all members of our committee agree about which proposed station location will be best for the neighborhoods, our comments favoring both stations are outlined below.

C-024-001 General comments favoring the 155th station location:

- A station at 155th would split the impacts on the neighborhoods more evenly
- A station at 155th is more central to southern Shoreline, allowing more residents easy access
- A station at 155th is closer to Shoreline businesses
- 155th street already has bike lanes and turn lanes in place

C-024-002 General comments favoring the 145th station location:

- A station at 145th would allow for the redevelopment of 145th street (which is already badly needed) which won't happen if the station is located at 155th
- The 145th location has more room available around the interchange area for parking and fewer houses will be lost
- Station construction will make a smaller impact upon both Seattle and Shoreline residential areas at this location and the result will have a positive impact upon community development with minimum disruption
- Station development/art/grounds development are more open, do not require massive habitat removal, and place smaller commuter pressure from the surrounding neighborhood arterials

Though we do not unanimously agree on station location, we are united in our concerns for impacts to both neighborhoods. The remainder of this letter details our feedback on each of the relevant sections of the DEIS.

C-024-001

Your reasons for favoring a station at 155th Street are noted.

C-024-002

Your reasons favoring a NE 145th Street Station location are noted.

C-024-003 | Acquisition – property impacts

We would like to request that the fewest possible number of residents be displaced, and that the fewest possible number of properties be taken for the light rail line and the stations combined.

C-024-004 | Land use

Shoreline was recently named a Tree City, USA. We would like to request that Sound Transit retain as many trees as possible.

C-024-005 | Economics

We would like to request that Sound Transit pay special attention to commercial traffic during construction, and to mitigate negative impacts such as noise, dirt, and heavy loads on residential streets.

Some members view a 155th street station to be a better location for Shoreline business. In particular, the 155th street location is a direct line to the proposed Aurora Square redevelopment project.

Neighborhoods

Many of the concerns we discussed are about safety:

- C-024-006** |
 - Many residents have expressed opposition to a parking garage at the station location, as it will encourage more traffic
- C-024-007** |
 - Concern that the homeless population will be drawn to the station as a refuge
 - Concern about an increase in crime around the station
 - Concern about the safety of school crossings as more traffic comes into neighborhoods
 - Concern about the lack of adequate sidewalks and crosswalks at intersections
 - Concern about inadequate lighting in and near stations
- C-024-008** |
 - Concern that increased traffic at 145th will result in using side streets as “cut-throughs”
- C-024-009** |
 - Concern that light rail tracks may create a divide between east and west Shoreline
- C-024-010** |
 - Suggestion to mitigate traffic impacts by adding traffic circles to discourage “cut-throughs”
- C-024-011** |
 - Concern about increased traffic in general, no matter where a station is located
 - Request to separate pedestrian walkways from vehicle traffic on major streets leading to a station

Visual and Aesthetic Resources

We have concerns about trees, noise, and views:

- C-024-012** |
 - Concern in general about tree loss
 - Request to preserve as many existing trees as possible on 5th Ave NE
 - Request to replace any removed trees with mature trees
 - Request that the rail line be at grade as much as possible
 - Request mitigation in upper Ridgecrest for noise and views

C-024-003

As described in Chapter 2, Alternatives Considered (Section 2.6.1), Sound Transit's planning of the alternatives emphasized opportunities to minimize environmental impacts, particularly property acquisitions and displacements.

C-024-004

Sound Transit will comply with all applicable tree protection standards in City of Shoreline Municipal Code 20.50 Subchapter 5 and minimize vegetation and tree removal to the extent practical.

C-024-005

Mitigation measures to reduce impacts to residential streets during construction are described in Section 3.6 of the Draft EIS. The members' preference for 155th Station due to better access to existing businesses is noted.

C-024-006

Sound Transit would mitigate impacts on NE 145th Street or NE 155th Street as a result of additional traffic using the park-and-ride garages. Please refer to the Final EIS.

C-024-007

Sound Transit maintains all of its stations to ensure they remain clean and safe. The stations will be well lit, feature security cameras, and are regularly monitored in person by security personnel. As described in Section 4.14 of the Draft EIS, crime is not expected to increase as a result of operation of the stations, in part because of project design and because most areas in the project corridor have low crime rates. Presence on station platforms requires proof of fare payment and fare-paid areas will be regularly patrolled by fare inspectors and security personnel.

C-024-012	<ul style="list-style-type: none"> Concern about westerly views from Ridgecrest <p><u>Air Quality and Greenhouse Gases</u></p>
C-024-013	<p>We have several requests to address concerns that increased traffic around stations will degrade air quality during and after construction:</p> <ul style="list-style-type: none"> Request design of parking structures is easy-in, easy-out to minimize exhaust Request dedicated freeway ramps to and from parking structures Request adequate dedicated motorcycle parking Request adequate bike stalls <p><u>Noise and Vibration</u></p>
C-024-014	<p>We are concerned that removal of many trees will increase freeway noise for many neighbors. As a mitigation, we would like to request replanting of trees along the rail line and up into the Ridgecrest neighborhood.</p> <p><u>Ecosystem Resources</u></p>
C-024-015	<p>We would like Sound Transit to address any potential issues from runoff, and request that there is continued monitoring of streams that light rail will cross for pollutants.</p> <p><u>Water Resources</u></p>
C-024-016	<p>We request permeable sidewalks and driveways at the station to help minimize increased runoff caused by the station footprint.</p> <p><u>Energy Impacts</u></p>
C-024-017	<p>We request that utilities to and from the station be run underground, and that solar energy be used where possible to power stations.</p> <p><u>Geology and Soils</u></p>
C-024-018	<p>We have two concerns here: Ridgecrest Community Park and the two peat bog parks. We believe Ridgecrest Community Park could be destabilized by constructions and regrading, so we would like Sound Transit to ensure a soil study is done here.</p> <p>Twin Ponds Park and Ronald Bog Park have peat bogs. We have questions about whether vibration may adversely affect the soil under those parks.</p> <p><u>Parks and Recreation</u></p>
C-024-019	<p>Our concerns here are mainly about Ridgecrest Community Park:</p> <ul style="list-style-type: none"> What about the existing berm and trees? We would like those to be replaced

None of the alternatives would have an operating school close by and they would not affect travel times or routes for school buses. Lakeside School is the closest school to a station (NE 145th Street Station). As described in Section 4.14.2 of the Draft EIS, the safety-related improvements (sidewalks and protected crossings) to serve all pedestrians accessing the station would also improve the walking environment for Lakeside students. Section 3.6.9 of the Draft EIS discusses notification and communication with school officials so they may provide advanced and ongoing notice to students and parents concerning construction near schools.

C-024-008

As described in Section 3.6.4 of the Draft EIS, measures to address cut-through traffic impacts could include signage, traffic calming measures or other cut-through restrictions, and would be determined in conjunction with local jurisdictions.

C-024-009

Sound Transit evaluated the potential for disruption or separation of the community in the Draft EIS in Section 4.4 Social Impacts, Community Facilities, and Neighborhoods. In Section 4.4.1, the point is made that the City of Shoreline is currently bisected by I-5, which limits the east-west street network. Tall trees, sound barriers, and the noise of vehicular traffic further define this existing line in the city. The light rail project would not remove east-west connection points over the freeway. Stations at major arterial crossings is more likely to encourage east-west movements within the community. Please see Section 4.4.2 for more information.

C-024-010

Please see response to C-024-008.

C-024-019

- Request that Sound Transit ensure that the playing fields remain the same size
- Request that Sound Transit ensure to replace any lost public land with new public land
- Request that Sound Transit mitigate noise in the park

Thank you in advance for considering our comments. All of the members of our committee look forward to providing additional input as the plans for the station move forward.

Sincerely,

Robin Lombard for the 145th/155th Street Station Citizens Committee

C-024-011

As described in Section 3.2.5 of the Final EIS, Sound Transit would provide pedestrian and bicycle improvements at Lynnwood Link Extension stations consistent with its current System Access Policy to safely accommodate projected increases in pedestrian and bicycle travel associated with the project. Sound Transit would also work with local agencies to determine which pedestrian and bicycle improvements would be most appropriate to support station access and safety. Any new facilities would be designed and constructed to meet or exceed local jurisdictional standards for pedestrian and bicycle mobility.

C-024-012

Tree loss was discussed in the Draft EIS discussion (loss of mature vegetation in Viewshed 5) on pages 4-77 and 4-78. Mitigation measures such as preserving trees and replanting vegetation is discussed in the Draft EIS on page 94. Planting of mature trees is generally not recommended due to lower levels of survival of larger specimens, but other measures to help soften the initial impacts as replacement vegetation matures are available. See section 4.5.6 of the Final EIS for an updated discussion of the mitigation measures proposed. As described in Section 4.7, severe to moderate noise impacts due to the project will be mitigated.

Your preference for an at grade design is noted.

C-024-013

The potential for air quality and greenhouse gas emission impacts was examined by modeling the emissions at several of the more congested and high volume locations along the corridor, including near stations, as discussed in Section 4.6.3. Sound Transit found no violations of federal air quality standards in these locations. Design for the station and parking facility will be based on Sound Transit Design Standards and local agency input and review, as well as by WSDOT and

FHWA. Direct access to an interstate from a park and ride structure is not being considered because new access points to I-5 are not allowed by FHWA, but modified ramp access is being considered for several alternatives that would provide effective connections to the freeway. Access plans and designs for the station will address all modes, including the provision of bicycle facilities and storage.

C-024-014

Foliage, if dense, can provide slight reductions in noise levels. There is up to a 3-dBA reduction in transportation noise for locations with at least 100 feet of dense foliage that contains leaves all year. Also, a 3-dB reduction in noise level is barely perceptible to most people; therefore, foliage in virtually all areas of this project corridor will have little overall effect on light rail or traffic noise. On the subject of replanting removed foliage, please see the response to C-024-12.

C-024-015

Managing stormwater volumes and pollutant discharges to natural water bodies is a priority for Sound Transit. Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on ecosystem mitigation is to avoid impacts on environmentally sensitive resources (including water resources) to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects. The project would be designed to comply with all federal, state, and local regulations to remove pollutants and control potential risks to water resources through project planning, design, and the application of best management practices.

C-024-016

Sound Transit requires all projects to consider low-impact development (LID) methods, such as permeable pavement, as a first choice for

stormwater treatment (Design Criteria Manual, July 2012). As summarized in Section 4.9.1 of the Draft EIS, the most common soil group in the project area is Type C, which is predominantly till-type soil that has a low infiltration and high runoff potential, generally not compatible with many LID approaches such as permeable pavement that require soil to infiltrate. However, some other locations in the project area contain Soil Types A and B, which have high to moderate infiltration potential, respectively, and are generally compatible with many types of LID stormwater facilities. Sound Transit will evaluate the feasibility of permeable pavement throughout the project area.

C-024-017

As described in Section 4.15.2 of the Draft EIS, power connections for the traction power substations to the nearest existing power source would be either overhead or underground. Section 4.15.3 of the Draft EIS describes existing utilities that may be relocated where they intersect the alternative alignments. The method of relocation would be consistent with Sound Transit's policy of replacing existing utilities in-kind when the relocation is to be funded by Sound Transit. The potential for using solar energy or other renewable energy sources is consistent with Sound Transit's Sustainability Policy, and would be reviewed during final design.

C-024-018

A geotechnical evaluation of the potential impacts of this project on Ridgecrest Park was completed as a component of design development. At both Twin Ponds Park and Ronald Bog Park, the preferred alignment is located on the east side of the freeway. Due to the distance of the project from the park, the vibrations during construction and operation of light rail are unlikely to affect the soils below the parks. Vibration monitoring equipment will also be routinely deployed along the alignment during construction to assess vibrations. If potentially damaging vibrations associated with construction activities are recorded, mitigation

measures (such as different types of equipment, protection at receptor locations, etc.) would be implemented.

C-024-019

Thank you for sharing your concerns regarding Ridgecrest Park. Sound Transit is working closely with the City of Shoreline to minimize impacts to Ridgecrest Park and mitigate unavoidable impacts. Based on preliminary design, a portion of the existing berm and trees will likely need to be removed. Sound Transit will coordinate with the City to replace the screening and noise reducing function of the berm and trees where possible. No impacts to the playing fields are anticipated.

LINWOOD LINK DEIS COMMENTS
401 Jackson St.
Seattle WA 98104

Att: Lauren Swift

C-025-001

I write regarding the fate of the Latvian Lutheran Church and Cultural Center at 11710 3d Ave. NE under plans to extend Light Rail northward in Seattle. It will be a tragedy if this ethnic and community resource were to be demolished.

On the heels of WWII, many thousands of Latvians found refuge in the United States from the Soviet occupation of their small Eastern European country. Many of them settled in large urban areas, including Seattle. While becoming responsible and productive citizens in their new land, they nevertheless managed to retain their language and many aspects of their culture heritage. They created self-help organizations, started Latvian language schools for their children, organized cultural events, and built their own churches, largely with volunteer labor. Their children's children still benefit from their labors and carry on the tradition.

Latvian church buildings serve not only their congregations' spiritual needs, they function as community centers for broader audiences, venues for cultural and sports events. Over the generations many smaller Latvian communities in the United States have disappeared or have greatly diminished their activities. Not so Seattle; it is one of the most active Latvia-American communities on the North American continent. In addition, its facility on 3rd Avenue is used by many other organizations.

I urge you to avoid demolishing this both symbolic and real example of successful American multiculturalism at work. If the building can be saved, then all steps should be taken to maintain access to the site during construction to prevent interruption of its community services.

Sincerely,

Lilita Bergs
Director, The Latvian Museum
The American Latvian Association in the United States, Inc.
400 Hurley Avenue, Rockville, MD 20850

C-025-001

The Sound Transit Board directed Sound Transit to explore a Preferred Alternative that would avoid displacing the church. The Final EIS describes the results of additional engineering Sound Transit undertook to avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained, although a small portion of land on the property's edge would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes including: Section 2.5.1 describing the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.



Karlis Lenšs
Amerikas Latviešu Jautatnes Apvienība

September 18, 2013

SOUND TRANSIT
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104

To Whom It May Concern,

I am writing to you on behalf of the American Latvian Youth Association ("ALJA"). Our mission, since our founding in 1952, has been the furtherance of Latvian culture, language, and knowledge among Latvian youth across all of the United States. Over the past 61 years, we have had thousands of members throughout the country, and we are currently as active as ever in our history. While most of our membership resides in the Midwest, a core component of our ability to succeed in our mission is broad support from all of the Latvian community centers in the country. Since 1971, we have frequently used the Seattle Latvian Center for meetings and events. In addition, on several occasions, we have held our biggest annual event, Congress, in Seattle. From our perspective, The Latvian-American "experience" in Seattle is not rooted in Pike Place Market or the Space Needle. It is the Seattle Latvian Center, nestled amongst towering evergreens on the north Side of town, that for generations has served and nurtured our tight-knit community. While it may seem like another just another social hall or private structure standing in the way of a public works project, to us the Seattle Latvian Center truly IS Seattle. Countless weddings, confirmations, Youth Congresses, and other special events within the Latvian community have happened there. The Seattle Latvian Center is the largest and most vibrant in the Pacific Northwest, and I personally consider it the most uniquely beautiful Latvian community center in the United States. It is not just a simple social hall, but also a church and Latvian language school for our children. It was built from the ground-up by our fathers and grandfathers and to us, its importance goes beyond the bricks and mortar of the building itself.

This is especially true to our aging community members throughout America. To them their local Latvian community center is home. The Seattle Latvian Center is no different. Having lived through the horrors of World War II and the Soviet Occupation, our elderly population would definitely be the most affected by the loss or relocation of the Latvian Center. It will be recalled that the Soviet Union used eminent domain to make public their homes and possessions. To allow that to happen again, albeit with completely different motives, would no doubt be seen as a slap in the face to the elderly Latvian population in Seattle. Our cultural centers embody the decades of work, decades of struggle, and decades of pride within our ethnic community. In Seattle, the Latvian community is vibrant and alive largely as a result of having such a fine facility. For many in Seattle, the Latvian center represents their unique struggle and shows that with grit and perseverance they were able to build a community thousands of miles away from home. The term "negative impact" does not even begin to describe the toll that this project would take on the local Latvian community. The impact on our organization would be the loss of a facility that is integral to the furtherance of our mission.

C-026-001

Accordingly, we request that Sound Transit review each of the alternative routes in the DEIS, and select the one that has the least impact on the activities of the Seattle Latvian Center. To the extent there is an option that allows the Latvian Center to remain in its current location, we respectfully request that such alternative be reviewed and selected, and that any impacts be fully mitigated. The relocation of such a culturally significant facility would have substantial impact on ALJA and would be devastating to the local community in Seattle.

C-026-001

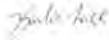
The Sound Transit Board directed Sound Transit to explore a Preferred Alternative that would avoid displacing the church. The Final EIS describes the results of additional engineering Sound Transit undertook so that none of the Segment A alternatives in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained, although a small portion of land on the property's edge would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a small portion of the church property.

Several sections in the Final EIS have been updated to address these changes including: Section 2.5.1 describing the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

C-026-001

While we understand the need and demand for public transit expansion in the city, our organization, ALJA, on behalf of our members nationwide, urge Sound Transit and the City of Seattle to re-route the proposed railroad to save our largest cultural, educational, and social hub in the Pacific Northwest.

Respectfully yours,



Karlis Lenss
President, American Latvian Youth Association
1777 W Altgeld D
Chicago IL 60614



September 23, 2013

Joni Earl, CEO
c/o Lauren Swift
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Sound Transit DEIS for the Lynnwood Link Extension

Dear Joni Earl,

On behalf of Cascade Bicycle Club (Cascade) and our more than 15,000 members, as well as our roughly 25,000 activists in the affected cities, I provide the following comments regarding the Draft Environmental Impact Statement for the Lynnwood Link Extension.

The region shares a objectives to reduce global warming pollution and vehicle miles traveled,¹ create economically thriving regional growth centers, increase affordability in considering both housing and transportation costs, and improve the livability of our communities. These objectives are repeated throughout state, regional and local laws and policies, from the state Growth Management Act and climate goal to VISION 2040 and Transportation 2040 to county and city climate action strategies and comprehensive plans.

Following the adoption of VISION 2040, the region's voters approved a key tool for fulfilling these objectives: expanding Sound Transit's light rail service to Lynnwood, Overlake, and Federal Way. As Sound Transit now expands light rail to its authorized extent, the key question facing the agency is how can its investment be best leveraged to achieve the region's shared objectives.

C-027-001 In this regard, Cascade makes several comments and recommendations. Our top two priority recommendations are:

1. Evaluate all potential new bicycle infrastructure within a three-mile radius of the proposed light rail stations, consistent with Federal Transit Administration rules and guidelines.
2. Compare the cost-effectiveness of all station-access investments in their ability to achieve transit ridership and the region's goals and objectives for creating "compact urban communities."

¹ RCW 70.235.020; RCW 47.01.440.

C-027-001

As described in Section 1.4 of the Final EIS, the light rail alternatives, including potential stations, are in response to the project's purpose and need, as defined in Chapter 1. While bicycle access remains an important consideration for the project, further study and detailed evaluations of bicycle access would not substantially differentiate the alternatives under consideration. All of the alternatives are designed to provide for effective pedestrian and bicycle access, including to and from the stations to feeder bus lines/stations, park-and-ride facilities, and to the surrounding street system. The project would be designed to satisfy all applicable public access, facility design standards, and life safety requirements. As described in Section 3.2.5 of the Final EIS, Sound Transit would provide for pedestrian and bicycle access at Lynnwood Link Extension stations and on streets reconstructed as part of the project, consistent with the agency's adopted System Access Policy. Finally, the Federal Transit Administration's rules and guidelines for a New Start project EIS do not dictate a 3-mile radius study area for bicycle facility inventories, but the project's EIS did include an inventory of facilities within 1 mile of potential stations.



C-027-002 Station Location Selection

These region's objectives are to reduce greenhouse gas emissions and vehicle miles traveled and to encourage compact urban development in regional growth centers and along high-capacity transit. VISION 2040 states:

Compact urban communities offer transportation, housing, and shopping choices that reduce the need for automobile travel and allow residents to walk or bicycle to neighborhood stores. Streets are laid out in a grid pattern or are interconnected, rather than as cul-de-sacs, to support efficient transit operations, as well as walking and bicycling. Typically there are a variety of housing types, such as single-family homes on smaller lots and small apartment buildings. Often small neighborhood activity hubs serve as centers for shopping and local services.

Compact development can be more efficient and cost-effective to serve with infrastructure and services. By creating an environment that is more conducive to walking, bicycling, and using transit, compact development can also contribute to reducing greenhouse gases and other pollutants.

Many of the region's transportation thoroughfares are lined with single-story, single-use developments. These areas present opportunities for redevelopment and infill. Along major transit routes, redevelopment can occur in the form of transit-oriented development, where mixed-use projects that provide housing, employment, and retail can focus around a transit station or hub and serve as an activity node for adjacent neighborhoods.

VISION 2040 supports compact urban communities and promotes the development of vacant or underutilized urban land in a manner that supports transit, conserves resources, and builds communities. VISION 2040 also supports redevelopment of selected low-density commercial corridors to make them more transit-oriented and pedestrian-friendly.²

As Sound Transit chooses station locations, the agency should make sure its selection matches the region's vision for compact communities.

Cascade strongly supports locating stations as far from Interstate 5 as possible. Interstates divide communities and significantly reduce the potential for transit-oriented development and the creation of a cohesive compact urban community. Interstates are also detrimental air quality, so building the central node farther away from the interstate can help reduce the potential number of people affected. Of the potential Lynnwood station locations, option C1 is the farthest from I-5 and the most centrally located toward likely transit-oriented development in the future. In addition, pedestrians and bicyclists may find navigating to get to the C2 and C3 locations difficult due to distance, signage, and unattractiveness. Likewise, Cascade strongly supports the Mountlake Terrace Transit Station instead of the freeway median station because the station would be nearer to redevelopment opportunities in Mountlake Terrace.

² VISION 2040, p. 52.

C-027-002

Alternative routes away from the I-5 corridor were considered during the Alternatives Analysis and early EIS planning, with participation from the public and jurisdictions. This included alignments along Lake City Way, 15th Avenue NE, and SR 99. Ultimately, the current station sites are in locations that still provide good multimodal access to nearby centers, but avoid higher impacts to the surrounding neighborhoods and the natural environment. Section 2.5, Descriptions of Light Rail Alternatives by Segment, gives further details on the planning, environmental, transportation, engineering and cost considerations that shaped the EIS alternatives, and the project's Alternative Analysis report is appended to the EIS. In Segment B, the Preferred Alternative has the station at the transit center, nearer the areas Mountlake Terrace targets for transit-oriented development. In Segment C, while Alternative C1 has the station closest to the city center, the connecting alignment also carried the highest level residential and displacement impacts, and impacted a city park. The Preferred Alternative, a modified C3, brings the station closer than the original Alternative C3 while still retaining that alternative's lower overall environmental impacts. The station area design also offers good visibility and allows effective bicycle and pedestrian connections from multiple directions.



- C-027-003** Cascade encourages Sound Transit to select stations that are already near existing business areas. The improvement of existing urban activity centers is an easier task than the creating whole new urban centers. The evaluation of the 130th, 145th, and 155th stations would be well-informed by this perspective.
- C-027-004** In selecting station locations, Cascade requests Sound Transit to evaluate how potential investments in pedestrian and bicycle infrastructure and transit circulator service could impact transit ridership and transit-oriented development. For example, the NE 145th Station may score better with pedestrian and bicycle connections to the business district on 15th Avenue, and the NE 155th Station may score better with transit circulator service and protected bike lane to the Shoreline Community College and Shorecrest High School.
- C-027-005** Cascade supports the addition of more stations, including two or three stations in segment A and two stations in segment B. More stations mean that more people will not have to go as far to access light rail, thereby favoring walking and bicycling as modes of access to the light rail system instead of automobile driving. Stations at NE 130th Street, NE 155th Street, and 220th Street SW, in combination with the NE 185th Street and Mountlake Terrace Transit Center stations, would best support a balanced access to the transit system that would support placemaking and access via bicycling and walking.

Purpose & Needs Statement

- C-027-006** Transit is not an end in itself, it is a tool toward achieving a set of goals and objectives. Unfortunately, the DEIS's "purpose and needs statement" confuses the purpose and need of transit by making highlighting the first purpose in itself. It's a circular argument: we must build transit because we must build transit.
- The region's transportation and land use goals and objectives are set out in VISION 2040 and Transportation, as quoted above. The extension of light rail is a tool to achieve those goals and objectives. As such, **Cascade urges Sound Transit to add the following statements to the beginning of the the DEIS purpose and needs statements.**
- New Purpose Statement, to lead the other purpose statements:
"Catalyze the development of compact urban communities consistent with VISION 2040 that improves household affordability of transportation and housing costs, reduces greenhouse gas emissions and vehicle miles traveled, and fosters transit-oriented development."
 - New Needs Statement, to lead the other needs statements:
"Address the need to accommodate the region's population growth in compact urban communities consistent with VISION 2040 in order to improve household affordability combined transportation and housing costs, reduce greenhouse gas emissions and vehicle miles traveled, and foster economic development."

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C-027-003

Section 2.5.1 describes the factors Sound Transit considered in developing its alignment and station alternatives, which in this corridor needed to balance transportation, access, land use, economic development, environmental and cost factors. As noted in the station by station qualitative ratings of station area transit oriented development, including for potential stations at NE 130th Street, NE 145th Street, and NE 155th Street, there are few business districts near the general alignment along I-5, outside of the two regional centers at Northgate and Lynnwood. Other alignments farther from the freeway would carry much higher environmental impacts and would carry longer travel times. Chapter 4, Section 4.2.4 summarizes the station area development potential by station area.

C-027-004

In the Draft EIS Chapter 5, Evaluation of Alternatives, Transit Oriented Development ratings were provided (see Tables 5-2, 5-3 and 5-4), based on a range of factors including multimodal access, as well as land use and development conditions. During the Alternatives Analysis and continuing into the EIS alternatives assessment, general station sites were identified for the project, bicycle and pedestrian qualitative measures were also considered (see the Alternative Analysis Report, Chapter 5, and Chapter 2 of the EIS). These measures, along with the other measures of potential mobility, ridership, and land use benefits, transportation impacts, environmental impacts, and constructability, have helped determine the range of station sites and the general features and access plans for the EIS analysis. Transit ridership estimates are primarily driven by population, employment, regional characteristics such as transportation conditions between origins and destinations (including highway conditions), and general accessibility to the station, rather by access by mode. During final design, consistent with the agency's System Access Policy, Sound Transit will continue to collaborate with the local jurisdictions on opportunities to improve bicycle and pedestrian



C-027-006

In addition, the needs statement to “Create a reliable alternative to automobile trips on I-5 and State Route (SR) 99,” is too narrow. The reduction of congestion is not a state or regional transportation goal.³ The state’s and region’s goals are to reduce vehicle miles travelled and greenhouse gas emissions no matter where they occur, whether it’s on I-5 and SR 99 or on neighborhood streets.

This distinction has a material impact. For example, the construction of a new parking garage for station access may decrease congestion or vehicle miles travelled on I-5 and SR 99, but it would also increase congestion on neighborhood streets as drivers drive to and park at the light rail station. **Cascade recommends amending the needs statement to read:**

“Create a reliable alternative to automobile trips within the project corridor and its communities.”

C-027-007

Evaluation of Bike Projects

Across America, people are learning the joys of bicycling. The most recent American Communities Survey found that 4.1% of Seattle residents reported that their longest commute each week is by bicycle, up from 3.6% the year prior.⁴

Public opinion surveys also consistently show that vast numbers of people want to bicycle more often. A scientific poll commissioned by Cascade in December 2012 found that 60% of Seattleites would like to bike more often.⁵ Why aren’t they? The top four barriers for Seattleites to bicycle more often were topography, distance, weather, and safety -- 72% said safety was a reason why they did not bicycle more often.

Sound Transit’s investment in light rail can help reduce all four of these barriers by providing an alternative means for bicyclists to get up some hills by taking the train, by reducing the travel distance for bicyclists, by providing an alternative to when the weather turns to rain or the cold, and by investing in station access projects that improve the safety and convenience for bicyclists to get to Sound Transit light rail stations.

Thanks to recently updated rules to the federal New Starts grant program, transit agencies can now include bicycle infrastructure projects up to three miles from a light rail station in their grant

³ See, RCW 47.04.280.

⁴ “Census data confirms steady climb in Seattle bike commuting, driving alone now below 50%,” Seattle Bike Blog (Sept. 19, 2013), <http://www.seattlebikeblog.com/2013/09/19/census-data-confirms-steady-climb-in-seattle-bike-commuting-driving-alone-now-below-50/#more-195618>.

⁵ “Memo: Seattle Voter Attitudes on Bicycling and the So-Called ‘War on Cars,’” FM3 (Jan. 17, 2013), available at “Survey: Bicycling is extremely popular in Seattle,” Seattle Bike Blog (Jan. 23, 2013), <http://www.seattlebikeblog.com/2013/01/23/survey-cycling-is-extremely-popular-in-seattle/>. Similar surveys in Portland and New York have found that people in those cities express interest in bicycling more if safety were improved.

networks serving the station, as an element of a balanced multimodal access plan that would effectively serve the transit riders expected at the station.

C-027-005

Your preference for more stations, including stations at NE 130th Street, NE 155th Street, NE 185th Street, and 220th Street is noted. The Preferred Alternative has options for additional stations at NE 130th Street and 220th Street.

C-027-006

Comment noted. The need for the project, as described in Section 1.2.2 of the Draft EIS, includes language on regional mobility and a decrease in transportation-related energy consumption and GHG emissions. The Purpose and Need also refers to environment and supporting regions’ adopted land use plans.

C-027-007

The increased use of bicycling is very consistent with trends showing greater use of transit and walking, and slower growth in vehicle use. The light rail project is part of an integrated solution encouraging other alternative modes, including bicycling, in the corridor and the region. In the EIS assessment of impacts, Sound Transit inventoried bicycle facilities within a 1-mile radius of potential stations, and considered potential conflicts as well as access needs, as described in Chapter 3, Sections 3.1.5 and 3.2.5 of the Draft EIS. The Final EIS has updated information. While bicycle and trail improvements within a 3-mile radius of transit stations can be grant-eligible under New Starts, they do not impose a minimum study area or a required set of non-motorized access improvements for New Start projects. As noted in the responses above, Sound Transit will continue to work on access planning with local jurisdictions during final design. This effort could include developing



C-027-007 applications without justifying the expense with a ridership study and without the additional cost weighing against the grant application's cost-effectiveness.⁶

In other words, transit agencies can now build any bicycle infrastructure project within a three mile radius and the only constraint in the Federal Transit Administration (FTA)'s evaluation process is the total available funds. In addition, bicycle infrastructure projects outside the three mile radius are also eligible for New Starts funding, but require justification based on ridership and would count against the cost-effectiveness of grant application.

Using a three-mile radius to evaluate and invest in bicycle infrastructure makes sense. For example, access to potentially big trip generators could be evaluated, such as protected bike lanes from the NE 155th Street Station to Shoreline Community College and Shorecrest High School, and from the 220th Street SW Station to Edmonds Community College. In addition, such a larger analysis would provide a more regional focus toward improving nonmotorized transportation options and access to light rail in Lake Forest Park, Edmonds, and Mukilteo.

Unfortunately, in discussing the mitigation to potential impacts on bicycle facilities (3.2.5), the Draft Environmental Impact Statement fails to commit Sound Transit to evaluating new bicycle infrastructure within a three-mile radius.

Given that all bicycle projects within a three-mile radius can be funded by New Starts without negatively affecting a grant application, **Cascade urges Sound Transit to go beyond its stated one-mile radius and evaluate all projects within a three-mile radius of each proposed station.**

C-027-008 Beyond the planning documents identified on page 3-38, planned bicycle infrastructure is identified in, or supported by, the 2013 update to the Seattle Bicycle Master Plan; all cities' capital improvement plans; cities' "complete streets" and "safe routes to school" policies; the Mukilteo Pedestrian, Bicycle, and Trails Plan; and the Lynnwood Transportation and Bicycle Plan. All bicycle infrastructure identified within these plans, and within a three-mile radius of any light rail station, should be evaluated by Sound Transit for investment.

Best practices for bikeways designs are constantly evolving. In order to make sure infrastructure is as safe as possible, as well as regionally consistent, we encourage Sound Transit to use the "Urban Bikeway Design Guide," produced by the National Association of City Transportation Officials (NACTO).⁷ The Federal Highway Administration recently adopted the NACTO guide as its baseline for bikeway design.⁸

In addition, Cascade finds that Sound Transit excessively restricts the evaluation and construction of bike infrastructure. The DEIS states that both mitigation and planned bike infrastructure would only be

⁶ "New and Small Starts Evaluation and Rating Process -- Final Policy Guidance," Federal Transit Administration (Aug. 2013), available at http://www.fta.dot.gov/documents/NS-SS_Final_PolicyGuidance_August_2013.pdf.
⁷ <http://nacto.org/cities-for-cycling/design-guide/>.

⁸ <http://nacto.org/2013/09/13/city-transportation-officials-praise-federal-highway-guidance-on-bicycle-design/>

strategies to assist the local agencies in identifying and prioritizing improvements, establishing partnerships, and seeking funding including other grants for supporting improvements.

C-027-008

Project designers will use the Urban Bikeway Design Guide by the National Association of City Transportation Officials, in conjunction with Sound Transit design standards and applicable WSDOT and local jurisdictional design standards. Please also see the response to C-027-007. The statements in the Draft EIS (page 3-38 and 3-39) relate to how Sound Transit would provide for pedestrian and bicycle access on roadways reconstructed as part of the project. Although other roadways in the study area may be reconstructed by the cities over time, bringing those facilities up to current standards, Sound Transit's conclusions about bicycle and pedestrian access immediately around stations generally did not assume such improvements.



C-027-008 "implemented with reconstructed roadways." Roadway reconstruction is too infrequent to make this a meaningful approach toward increasing the safety and convenience of accessing light rail stations. This is wholly inadequate. Investments in bicycle infrastructure need to be made proactively to encourage access, not wait forty years until a street is reconstructed.

C-027-009 **Encourage Non-Motorized Station Access**

The construction of parking lots or garages should not be considered a given. Sufficient parking already exists in many of the station-areas, the DEIS fails to fully analyze the potential environmental impact of the parking garages, parking garages are an expensive means to achieve ridership, and any investment in car parking spaces should be evaluated in comparison to other station-area access investments. To the extent that additional parking is deemed to be necessary, the surface lot or structure should be designed to allow future repurposing for transit-oriented development.

Cascade recommends better utilizing the existing available parking instead of building parking lots or garages. The DEIS itself found sufficient parking in most of the station areas, calling into question whether additional parking lots or structures are necessary. According to Table 3-5, there are a total of 6,130 unused parking spots available within a quarter-mile of the stations.⁹ In fact, only 15.6% of available on-street parking is utilized and 57.7% of off-street parking is utilized. Parking management strategies that utilizes the existing available parking would be a more cost-effective strategy for providing parking access while achieving regional goals for creating compact urban communities that rely more on bicycling and transit.

C-027-010 **Cascade recommends analyzing the vehicle miles travelled and greenhouse gas emissions induced by building a parking garage.** By building a parking garage as a means for drivers to access the light rail station, Sound Transit will be inducing people to drive to the station. Embedded in that inducement are greater greenhouse gas emissions and vehicle miles traveled. Sound Transit needs to calculate this environmental impact.

C-027-011 **Cascade recommends evaluating the cost of building a parking garage based on the marginal cost per stall and rider.** At \$30,000 to \$40,000 per stall within a parking structure, a stall in a parking garage is significantly more expensive than on a surface lot. However, in reality the cost is much more than even the \$30,000 to \$40,000 per stall. A stall in parking lot (without a structure) costs about \$4,000. Thus, if Sound Transit decides to build 350 stalls in a parking structure instead of 100 stalls in a parking lot (a price difference of \$14 million versus \$400,000, assuming per-stall costs of \$40,000 and \$4,000, respectively), the marginal cost of the additional 250 stalls is actually \$54,400 – or 36% greater. In evaluating the cost-effectiveness of a parking structure to increase transit ridership and achieve the

⁹ The Mountlake Terrace Freeway Station, Lynnwood Park & Ride, and Lynnwood Transit Center stations not included in the calculation in order to prevent any double counting.

C-027-009

Park-and-ride spaces minimize parking impacts to neighborhoods and provide access to light rail for areas transitioning from suburban to urban densities. As described in Section 3.2.7 of the Draft EIS, park-and-ride lots are generally sized to accommodate future parking demand, and the amount of parking at each station may be further refined in future phases of the project.

As described in Section 4.2.4 of the Draft EIS, analysis of alternatives included assessments for all proposed station locations based on existing conditions that support transit-oriented development, transit-supportive plans and policies, station access, and potential development opportunities. In addition, Sound Transit's TOD policy includes goals that encourage safe multi-modal access to the transit system, with an emphasis on non-motorized access; and support economic development efforts. Implementation of TOD policy continues through final design, construction, and post construction. Implementation includes identifying TOD opportunities and strategies as well as partnerships with public and private interests.

C-027-010

Vehicles traveling to and from parking garages were included in the traffic analysis and are reflected in the vehicle miles traveled and greenhouse gas emissions projections, the "hot spot" air quality analysis, and as part of the other evaluations of impacts for each of the project alternatives. This responds to the need for the EIS to identify significant environmental impacts and appropriate mitigation for the alternatives considered. During final design, Sound Transit's System Access Policy will continue to be applied as Sound Transit further evaluates the multimodal access needs of the project, working collaboratively with the communities to be served.



C-027-011 region's goals and objectives for placemaking and reducing greenhouse gas and vehicle miles traveled, it's important to use the right accounting.

C-027-012 Cascade implores Sound Transit to compare the cost-effectiveness of parking lots and garages to other station-access investments in their ability to achieve transit ridership *and* the region's goals and objectives. As described above, parking garages can be an incredibly expensive way to achieve ridership. But what's even worse is that parking garages are detrimental to the ability achieve the region's goals for creating compact urban communities that support bicycling, walking, and transit-oriented development.

In analyzing how to best to promote station access and achieve the region's goals and objectives, Sound Transit should conduct a mode-neutral analysis of station access, consistent with the agency's recently adopted "System Access Policy." This analysis should include all potential bicycle projects within a three-mile radius (consistent with FTA rules and guidelines), all potential pedestrian projects within a half-mile radius, local transit circulator service, and transit-oriented development on future surplus properties.

Finally, when it comes to transit-oriented development, location matters. A parking garage removes from economic development prime real estate that could otherwise go toward residential or commercial uses. These uses, in turn, would create a livelier neighborhood with more people living, working, and shopping in the area. As station areas develop, the land of a parking lot or parking garage will only become more valuable, especially in consideration of its proximity to the transit station. As such, Sound Transit should create a phased approach to its parking lots and parking garages so that they may be converted into a transit-oriented development in future years. In practical terms, this may mean favoring surface parking lots over structured parking garages.

Bicycle Safety

C-027-013 One of the key lessons from Cascade's scientific polling last December is that people would bike more often if they felt it was safer. Safety for bicyclists is as much of a perception issue as it is an infrastructure issue.

The study goes at great lengths to evaluate traffic collision data for the corridor. However, this collision data will not pick up the many traffic accidents that go unreported, and it will not include the perceived danger that people have toward riding a bicycle in mixed traffic.

In order to make people feel safe, protected bike lanes, neighborhood greenways, and regional trails will need to be built and maintained. If Sound Transit is going to be truly committed to improving station access via nonmotorized transportation options like bicycling, it will have to be proactive in building the infrastructure necessary to make people feel safe to ride on streets that are otherwise heavily used by fast cars.

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C-027-011

As part of final design for the project, Sound Transit will continue to examine options to increase the cost-effectiveness of the project. The alternatives involving parking garages rather than expanded surface parking reflect the limited availability of right-of-way along the corridor, much of which is already developed, although in some station sites there are options for surface parking. Overall, the EIS's range of alternatives, including the station locations and the parking capacity assumed, are in response to projected demand. Parking is one element of a balanced approach for a regional system that provides access via a variety of modes. The current demand for parking at all transit centers and major park & ride lots along this extension is greater than supply, with most lots full by 8 am or earlier on weekdays. It is reasonable to expect that as population and employment grows in the corridor, growth in transit center parking will also continue, as would growth in the use of other modes of access.

C-027-012

Sound Transit does not consider parking investments to be in competition with other access components of the project, nor does it consider parking to be inconsistent with local and regional goals for creating compact and walkable communities. Provisions for parking are part of a balanced approach to developing effective multimodal access to the regional system. The alternatives considered in the EIS, including provisions for parking garages, represents a long history of alternatives planning that is detailed in Chapter 2, and which includes the results of many rounds of public participation and comment. Additional parking as part of the project reflects the project description included in the ST2 Plan, funding for which was approved by voters in 2008, and which itself involved extensive public planning. The multimodal access reflects Sound Transit's adopted Systems Access Policy, which recognizes that people may choose among a variety of modes as they access a station, depending on their own needs and circumstances. As noted in



Thank you for considering Cascade Bicycle Club's comments and recommendations on the Lynnwood Link Extension Draft Environmental Impact Statement. If you have any questions about our comments, please feel free to contact me at brock.howell@cascadebicycleclub.org or 206-856-4788.

Sincerely,

A handwritten signature in dark ink that reads "Brock Howell".

Brock Howell
Policy & Government Affairs Manager
Cascade Bicycle Club

responses above, Sound Transit will continue to develop the more detailed station access plans for the adopted project during final design, and cost-effectiveness of a variety of project elements and design approaches will continue to be considered.

C-027-013

Sound Transit remains committed to developing effective multimodal access to its stations, but the project's purpose is focused on transit improvements rather than repairing existing deficiencies in the road, bike, and pedestrian network. The review of collision data was primarily intended to assist in evaluating whether the project would aggravate existing safety concerns or create new safety conflicts for bicyclists. Sound Transit is also committed to working with its partners to advance opportunities to increase the use of bicycles and other alternative modes that would connect the stations to the surrounding communities.



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September 23, 2013

Lauren Swift
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Lynnwood Link Extension Draft Environmental Impact Statement

Dear Ms. Swift:

Since 2001, Feet First has worked to ensure that all communities in Washington are walkable. We represent people of all ages looking for safe, accessible, and inviting ways to go by foot. Walking is a vital transportation mode that strengthens communities, reduces pollution, and promotes good health.

Feet First strongly supports the development of vibrant, walkable communities throughout the region. If done right, the construction of Sound Transit's link light rail system presents a great opportunity to foster the development of such communities. Station placement is arguably the most critical factor in creating walkable transit-oriented communities near stations. Consequently, we are following with great interest the environmental review for the Lynnwood link extension for light rail between Northgate and Lynnwood. Below are our comments on the recently-released draft environmental statement (DEIS).

The DEIS analysis of long-term TOD potential at each potential station seems to be largely based on existing local and regional land use plans. While this is a prudent approach, it's very possible that the area surrounding identified station sites will be subsequently upzoned to accommodate more development. The land use analysis should include potential additional development beyond that allowed in adopted plans, perhaps as a separate scenario in addition to the current plan scenario presented in the DEIS.

As a general rule, Feet First encourages locating stations away from the immediate vicinity of the I-5 freeway corridor. Locating stations right next to freeways decreases the amount of adjacent land available for transit-oriented development (TOD) and also reduces the size of the fifteen-minute walkshed surrounding the station.

Feet First supports the addition of an additional light rail station at NE 130th Street. This station would place an additional 5700 people within a fifteen-

C-028-001

The Draft EIS long term (direct) impacts assessment considered existing land use plans as well as plans in progress, focusing on consistency with existing or officially proposed local government land use plans and policies. Please see Section 4.2.4 Indirect and Secondary Impacts for potential impacts associated with possible changes in zoning by the local jurisdictions, which in some cases would be needed to allow higher density and mixed-use land uses in station areas.

C-028-002

As described in Section 2.5 of the Draft EIS (*Chapter 2 Alternatives Considered*), prior to the Draft EIS and Final EIS, Sound Transit evaluated a variety of options for this project based on a number of criteria. Future development potential was one of the criteria assessed during the Alternatives Analysis. The Sound Transit Board chose an I-5 alignment. Sound Transit continues to work with jurisdictions on planning for the areas around the stations to ensure multi-modal access is achieved.

C-028-003

Thank you for identifying the advantages Feet First sees in a NE 130th Street Station. The Sound Transit Board identified an at-grade and elevated alignment with stations at NE 145th and NE 185th streets (Alternative A1 with modifications) as the Preferred Alternative, and also directed further study of options to add a station at NE 130th Street or to make provisions for a future station. A station at NE 155th Street was not identified for the Preferred Alternative, but is still evaluated in the Final EIS under Alternatives A5 and A7. The Preferred Alternative also includes a station at the Mountlake Terrace Transit Station in Segment B. The Segment C Preferred Alternative is a modified Alternative C3 that places that station closer to the urban center and away from I-5, and includes improved walk access.

C-028-003

minute walk of the station and increase system-wide daily boardings of 400 riders under the current zoning. A station at NE 130th carries the additional advantage of opening the NE 125th/130th Street corridor to east-west feeder bus service. This will provide good bus access between the light rail system and the urban villages of Lake City and Bitter Lake.

We prefer a station at NE 155th Street instead of NE 145th Street. A NE 145th Street station has very limited potential for TOD, assuming that Jackson Park Golf Course and Lakeside School are off limits for development. NE 145th street is currently a terrible pedestrian street, with a large interchange, fast-moving traffic, wide intersections, and narrow sidewalks which will be difficult to widen. By contrast, NE 155th Street has a good, pedestrian-friendly, grid network of streets and more room for development.

Feet First strongly prefers the Montlake Terrace Transit Center over the Montlake Terrace Freeway Station. The Transit Center site puts the station within the Montlake Terrace Town Center. A station here will be much more accessible to pedestrians and a stronger TOD catalyst. The Freeway Station site puts the station about two minutes further away from the Town Center. Using the Transit Center site will increase system-wide transit ridership by 1000 riders per day.

Feet First prefers alternative C-1 (200th Street SW) for the Lynnwood station. This location is several blocks closer to the emerging Lynnwood urban village and is furthest away from I-5.

C-028-004

The current plan for the Lynnwood Link Extension includes thousands of new park & ride lots at most of the new light rail stations. Feet First believes that such a heavy reliance on structured parking is problematic. Structured parking attracts additional peak hour traffic to nearby arterials. Heavy traffic degrades pedestrian safety and discourages people from walking. Street intersections must be widened to accommodate additional turn lanes, thereby increasing pedestrian crossing distances. Traffic also brings increased noise and air pollution to the streetscape, creating a pedestrian-hostile environment. Structured parking also carries an opportunity cost in that land devoted to parking cannot be used for residential and retail development that contributes to the development of vibrant urban centers. Parking is also very expensive; the typical cost for structured parking is up to \$30,000 to \$40,000 per space. We feel very strongly that the final EIS should include a cost benefit analysis of structured parking along the Lynnwood Link Light Rail.

Thank you for considering our thoughts on the Lynnwood Link Extension DEIS. We look forward to working with Sound Transit in the coming months towards the development walkable transit-oriented communities. If you have any questions or concerns, please contact me by calling 206.652.2310 ext. 6 or emailing me at lisa@feetfirst.org.

Sincerely yours,



Lisa Quinn
Executive Director

C-028-004

As described in Section 2.3 of the Final EIS, the project is applying a balanced multimodal approach to plan for effective station access, consistent with Sound Transit's adopted System Access Policy. Parking along with other features of the stations would help serve a variety of user types including non-motorized users, those commuting by automobile, and those arriving on feeder bus lines. Park-and-ride spaces help minimize transit-related parking impacts to neighborhoods, and also provide access to light rail for areas transitioning from suburban to urban densities, as well as for areas that are more distant from the alignment or with less convenient connections via transit or other non-automobile modes. The use of parking garages, while more expensive than a surface lot, helps preserve the future potential for transit-supportive developments within the larger station area. Section 4.2.4 of the Draft EIS summarized an assessment of station locations based on conditions that could support transit-oriented development.

As described in Section 3.2.7 of the Draft EIS, park-and-ride lots are generally sized to accommodate predicted parking demand, although the amount of parking at each station may be further refined in future phases of the project.

FABS

Fellowship of American Baltic Spouses



A Washington State Organization Whose Members Have Spouses of Estonian, Latvian or Lithuanian Heritage

Richard C. Wiest
Chair
2030 151st Pl. SW
Lynnwood, WA 98087-6345
Tel. 425-678-8774
fabs@gmail.com

September 23, 2013

Sound Transit
Draft EIS Comments c/o Lauren Swift
401 S. Jackson St.,
Seattle, WA 98104

C-029-001

I write to add the voice of the organization which I chair to the chorus of concern (which I hope has turned into an avalanche) about the fate of Latvian Church & Community Center in the face of light rail expansion to Lynnwood. FABS has a few dozen core members, but our extended families and friends number much more. We exist to support the efforts our ethnic wives and husbands, and our often bilingual children and grandchildren, to celebrate and preserve their heritage. None of our group is of Baltic background but we have married into rich, vibrant and diverse cultures. All of us share in our own lives a deep experience of the uniqueness and worth of the traditions of the three countries.

We can approach the matter with a degree of an outsider's critical detachment and at the same time feel the insider's passion. One aspect, however, is crystal clear: the Latvian Community Center & Church is the node or nexus or focus, call it what you will, of the ability of all three cultures to continue to flourish in Washington State. It is the physical tie that both binds and allows for freedom. If the many threads of activity that run through the institution are seriously frayed or severed, the survival of the cultures and their wider beneficial effect in our state are threatened.

We support in principle the expansion of light rail but we urge you to recast your designs in order to leave the unique and irreplaceable Center and Church as unaffected as possible.

Yours very truly,

Richard C. Wiest
FABS Chair

C-029-001

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.



Latvian Association of the State of Washington

P.O. Box 75081
Seattle, WA 98175-0081

Sound Transit
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104

C-030-001 We, the 300+ members of the Latvian Association of the State of Washington, are deeply concerned and bitterly disappointed about your proposed Light Rail plan. If the plan proceeds, it will drastically disrupt the well-being and perhaps even destroy the existence of the Latvian Lutheran Church and Cultural Center. Your planned construction of the Light Rail link between Northgate and Lynnwood does not seriously consider the social, cultural and physical impact on our old and well established multifunctional Center.

C-030-002 As you know, our first church and cultural center was taken for a park by the city of Seattle in 1969. Now it appears that we are facing possible condemnation and eviction for the second time in our 62-year history. In addition to our bitterness about the proposed plan, we most emphatically feel that virtually no consideration was given in your earlier planning to our facilities and the organizations which depend upon the Center. Although your current options do take minor note of our existence, those options are nonetheless inadequately thought through and need considerable further study. Issues of concern include, among others, track alignment, access, construction impact, noise abatement, geotechnical matters and the destruction of our caretaker's house.

In our opinion, Sound Transit has not fully examined nor addressed and given clear responses to our concerns. There also has been no meaningful rail alignment option given, such as relocation of the rail bed. There have been no solutions offered for the noise problems, vibration, lights and radio interference nor is there evidence of geotechnical studies having been performed.

For these reasons we request that you seriously review your plans and reconsider the DEIS and provide us with other workable alternatives.

Sarma Davidson,
Chairperson

Sarma Davidson	Inta Wiest	Valdis Jodais	Titis Jaundalderis	Aina Uskurs	Ingrid Doherty	Paul Kahins
Chairperson	Vice-Chairperson	Treasurer	Assistant Treasurer	Secretary	Membership	Board Members

C-030-001

The Sound Transit Board directed Sound Transit to explore a Preferred Alternative that would avoid displacing the church. The Final EIS describes the results of additional engineering Sound Transit undertook to avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions have been maintained, although a small portion of land on the properties edge would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property, but an elevated design by the church is not the Preferred Alternative.

Several sections in the Final EIS have been updated to address these changes including: Section 2.5.1 describing the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

C-030-002

Based on the comments from the Association, the church and many others, Sound Transit has updated the design of the at-grade alternatives as well as the discussions of impacts to the church. The Final EIS has further discussion of the avoidance, minimization and mitigation measures that the Preferred Alternative and other alternatives would incorporate. The presence of I-5 to the west limited options for realigning the tracks without creating more impacts to adjacent properties, but the Preferred Alternative and other at-grade alternatives, have a revised design that maintains access to the church. The design and analysis for the Final EIS has also further defined a realigned

access road that would be rebuilt to current standards, along with a rebuilt sound wall. The caretaker's building would be relocated, and Sound Transit would work closely with the church to identify a suitable relocation option. Vibration and noise impact information has been updated as well. The vibration analysis incorporated the results of geotechnical studies that included borings along with soils analysis. Section 4.7.3 of the Final EIS discusses noise and vibration impacts and Section 4.7.7 describes the proposed mitigation measures that would be applied. Section 4.5.2 discusses long term visual impacts and Section 4.5.3 discusses short term visual impacts, and mitigation measures for visual impacts are discussed in Section 4.5.6. Section 4.13 of the Final EIS discusses electromagnetic fields, which are produced whenever electricity is used. No sensitive receptors (i.e. hospitals, radio stations) are within the range of the light rail line, and it is not expected that the light rail would interfere with the Latvian Evangelical Lutheran Church's radio.



**LETTONIA
STATE OF WASHINGTON ALUMNI
ASSOCIATION**

September 14, 2013
Mukilteo

Sound Transit
Draft EIS Comments
c/o Lauren Swift

I am writing to you on behalf of the 22 current members of Latvian fraternity Lettonia State of Washington Alumni Association. Lettonia uses the Seattle Latvian Community Center several times a year for our chapter meetings and important celebrations, like our annual anniversary of the founding of the fraternity in 1870. More importantly many of Lettonia's members were among the Latvians who volunteered both time and money to build the existing facility at 11710 3rd Avenue NE. Because of the work and money the many Latvian fraternities devoted to the Center, we were granted free use of the Center's facilities. Losing this means we will have to use our membership dues to pay for facilities, rather than donating the money to educational causes, like the Latvian school.

All of us have been or still are active in other groups (church, seniors group, choir, folk dancing, golf association) associated with the center, including in leadership roles in these groups, so we will feel the disruption due to the impacts there too.

C-031-001

We request that the Sound Transit board take into account the needs of the Baltic community that utilizes this facility, find mitigations that will allow the Center to remain in its current location and continue to serve this very unique population.

fil! Eric Raisters
Secretary
Lettonia, State of Washington Alumni Association
10507 64th Place West
Mukilteo, WA 98275

C-031-001

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall. With the realigned street, access to the property has been maintained, although a portion of land on the church property would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the Preferred Alternative and the refinements in other alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods. In addition, Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative, and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property, including a portion of a property, would require fair compensation to the property owner in accordance with Sound Transit policy and federal and state law.

Swift, Lauren

From: Eriks Raisters <raisters@comcast.net>
Sent: Saturday, September 14, 2013 9:04 AM
To: Lynnwood Link DEIS
Cc: Raisters@Home
Subject: Comments on Lynnwood Link DEIS
Attachments: LettoniaSoundTransitLetter.pdf

Attached please find comments on the Lynnwood Link DEIS from the Latvian fraternity Lettonia regarding the effect on our organization due to the impacts stated to Seattle Latvian Church and Community Center at 11710 3rd Avenue NE, Seattle.

Regards,
Eric Raisters
Secretary
Lettonia, Sate of Washington Alumni Association
10507 64th PL. W
Mukilteo, WA 98275

*Northgate West Condominiums
11300 1st Avenue Northeast
Seattle, Washington 98125*

Sound Transit
401 South Jackson Street
Seattle, Washington 98104
Attention: Lauren Swift, Lynnwood Link Extension DEIS

Dear Seattle Sound Transit:

The owners and residents of Northgate West Condominium have the following concerns and suggestions regarding the proposed route of light rail from Northgate to Lynnwood.

- C-032-001** First, we wish to throw our support for the A1 proposal. We feel this will have the least impact along First Avenue Northeast. However, Sound Transit *must* make sure that we have ingress to and egress from our property at all times, as that is the only unencumbered entry/exit from our property.
- C-032-002** Additionally, we ask that Sound Transit work with the City of Seattle to install a left-turn signal from Northgate Way on to First Avenue Northeast to mitigate the loss of the bridge that crosses I-5. Without that mitigation, it will be difficult for vehicles exiting and entering our property.
- We also wish to express our concerns:
- C-032-003** The trees that line First Avenue Northeast are over 30 years old and irreplaceable. They screen noise from the highway, act as a dust screen to clean the air, and are visually attractive. Additionally, they provide shade and offer protection from the wind. Many studies have shown that people are happier and healthier when they look at natural, green scenery. We would hope that Sound Transit will do everything possible to preserve these trees, up to and including relocating them along the avenue, before considering chopping them down and replacing them with younger trees.
- C-032-004** Damage to our property as a result of construction must be monitored. We are specifically concerned about cracks in the asphalt and the foundation of the building on our property. We understand that soil samples were taken, and we would like to see a copy of the report in order to better understand any potential impact on our property.
- C-032-005** We also would like noise-monitoring and vibration-monitoring devices placed on our property to monitor the noise and vibration levels during and after the construction of the light rail and the running of the trains.
- Very truly yours,

The Owners and Residents of Northgate West Condominium (see attached list for signatures).

C-032-001

Your support for Alternative A1 is noted. During construction, access to your property will be maintained.

C-032-002

Although Alternative A1 was the basis for the Preferred Alternative, the Preferred Alternative does not require a reconstruction of the NE 117th Street overpass. If the overpass were to be reconstructed for the project, Sound Transit would coordinate with the City of Seattle for any changes to the intersection configuration or signal operation at Northgate Way and First Avenue NE, or for any other solution needed to maintain access via First Avenue NE.

C-032-003

As shown in Appendix F, Conceptual Plans, the proposed alignment extends through the trees on the east side of 1st Avenue NE in the vicinity of Northgate West Condominiums, and some tree removal would be required. Trees provide fairly low levels of noise reduction, but Sound Transit has evaluated the potential for increased noise due to the light rail project at the condominiums, and noise barriers on the elevated guideway would be part of the project as mitigation. Sound Transit will also comply with all applicable tree protection and replacement standards in City of Seattle Municipal Code Chapter 25.11. Potential mitigation measures are described in Section 4.5.5 (Visual and Aesthetic Resources) of the Final EIS.

C-032-004

During construction, Sound Transit would minimize the use of vibratory soil compactors and vibratory hammers near structures that are determined to be vibration-sensitive. Sound Transit would also avoid conventional vibratory hammers that have the potential to cause objectionable vibration and risk cosmetic damage. See Section 4.7.7 of

Below is my signature to be appended to the letter to Sound Transit regarding the light rail extension Lynnwood.

Print Name of Owner or Resident	Signature of Owner or Resident
Linda Deneault	Linda Deneault
GRACIAS ZARIDES	Gracias Zarides
Carolyn Darcy	Carolyn Darcy
RANDY WHIPP	Randy Whipp
Anna Segel	Anna Segel
Chao-Lin Hsieh	Chao-Lin Hsieh
Jon Jacobys	Jon Jacobys
Sherry L. Lutton	Sherry L. Lutton
Mohan Marki	Mohan Marki
CHERYL CRAWFORD	Cheryl Crawford
MAIZEL PUJIDANI	Maizel Pujidani
JAMES VANDERHOEK	James Vanderhoek
VICTOR NELSON	Victor Nelson
Sai Li	Sai Li
Amelia PHILLIPS	Amelia Phillips
Lester Logan	Lester Logan
BETTY HILTBURNE	Betty Hiltburne
Karen Welt	Karen Welt
JANNA CONDREA	Janna Condrea
Soon Suk Seo	Soon Suk Seo
EMILIE PADIERNOS	Emilie Padiernos
TRAVIS WILLIAMS	Travis Williams
VALERIE GARCIA	Valerie Garcia
Ginger Rebstock	Ginger Rebstock
JASON NEWMAN	Jason Newman
CAROLYN CAMPBELL	Carolyn Campbell

Page 1

the Final EIS for further information on potential mitigation measures. Geotechnical analysis continues through final design. Geotechnical Reports can be obtained by contacting community outreach staff identified in the Draft and Final EIS.

C-032-005

The Draft EIS identifies two construction activities with the potential to cause damage to adjacent buildings due to vibration during construction of the Lynnwood Link: vibratory pile driving and soil compaction using vibratory rollers. Sensitive structures along the alignment are at risk of cosmetic damage (the earliest indication of damage) wherever vibratory pile driving is conducted within 80 feet of a sensitive structure or a vibratory roller is operated within 40 feet of a sensitive structure. The distance to the nearest track at 11300 1st Avenue NE, Seattle is 38-45 feet, depending upon the alignment alternative. Therefore, vibration monitoring will be conducted at the building if any of the above activities are conducted next to the property. See Section 4.7.4 of the Final EIS for more information on construction impacts and Section 4.7.7 discussion of mitigation measures.

Vibration levels from running trains will be below the threshold of human perception at the property and, subsequently, will be far below levels posing any risk to the structure. Therefore, vibration monitoring of running trains is not warranted. See Section 4.7.1 of the Final EIS regarding the FTA criteria used to evaluate sensitivity to noise and vibration.

Below is my signature to be appended to the letter to Sound Transit regarding the lightrail extension Lynnwood.

Print Name of Owner or Resident	Signature of Owner or Resident
Jonas Wilhelm	Jonas Wilhelm
Lynn Powa	Lynn Powa
Meriste Riggs	Meriste Riggs
Ana Pastor	Ana Pastor
EDNA HARRIS	Edna J. Harris
GARRET TORNO	Garret Torno
Chelsea Entrop	Chelsea Entrop
VERNA L. SAMUELS	Verna L. Samuels
SHAM-CHU PEKG	Sham-Chu Pekk
Johnny Kim	Johnny Kim
Chris Nguyen	Chris Nguyen
Ray No	Ray No
Mildred L. NISCO	Mildred L. Nisco
Holly Quimby	Holly Quimby
KATY CHOW	Katy Chow
Monica Alquist	Monica Alquist
RENEE LECK	Renee Leck
LEILA BENTHARRATS	Leila Bentharrats
Ronald + Gloria Jefferson	Ronald + Gloria Jefferson
Kavonne Lynn	Kavonne Lynn
Nilla Hark	Nilla Hark
ELENA ANASTASIA	Elena Anastasia
Tadesse Wodajo	Tadesse Wodajo
ROBERT LU	ROBERT LU
ALISON PAARMEN	Alison Paarmen
KARLA KOON	Karla Koon

**Below is my signature to be appended to the letter to Sound Transit regarding the
lightrail extension Lynnwood.**

[illegible]

Paramount Park Neighborhood Group

c/o Janet Way
940 NE 147th St.
Shoreline, WA 98155

September 23, 2013

Sound Transit Board
c/o Roger Iwata
<mailto:roger.iwata@soundtransit.org>
Union Station
401 S Jackson St
Seattle, WA 98104

Subject: Comment on Lynnwood Link Light Rail Draft EIS

Dear Mr. Iwata and Sound Transit Board:

Please accept our comments on the Draft EIS for Lynnwood Link Light Rail Project.

Paramount Park Neighborhood Group is a non-profit, grassroots organization incorporated in 1994, working for the protection and preservation of the neighborhood and ecosystem as it relates to Paramount Park Open Space and its related watersheds. It is composed of citizens and board members who all live in the neighborhood directly affected by the proposed North Corridor Transit Project and Light Rail Station area.

The Group seeks to bring individuals, groups and governmental entities and businesses together to address the issues relevant to preserving and protecting the beauty, natural features, hydrology and wildlife habitat found in and around Paramount Park Open Space.

The Group undertakes projects to preserve, protect and restore the eco-system native to the park, including, but not limited to: vegetation, streams that flow through the park, wetland areas within and around the park, and wildlife habitat within and around the park.

The Group sponsors and promotes educational programs, increased public awareness, facilitation of the exchange of ideas and information regarding events, projects or developments relevant to the park and related water shed preservation and protection projects.

C-033-001

We request "party of record" status with Legal Standing in this matter.

Please include our comments in the hearing record, and consider them in your administrative review and notify us of any and all meetings, hearings or updates on this proposed project.

We are concerned about severe, adverse environmental impacts of this project, which cannot be mitigated with the current proposal. These impacts would include direct, indirect and cumulative impacts of the project to the environment, especially to the surrounding neighborhood. We believe our citizens, neighborhood and our environment would be impacted in a number of ways by the current proposal including, but not limited to: increased traffic congestion, reduced traffic safety, inappropriate housing density, reduced water quality and quantity, increased localized flooding, increased taxes and other financial costs including reduced property values, increased air pollution, noise and glare, loss of wildlife and habitat, tree loss, loss of scenic and other aesthetic values, increased carbon impacts, and loss of their procedural due process rights.

We incorporate by reference, our original scoping letter dated April 23, 2012, and all of the comment letters received at that time. We also incorporate by reference all documents, studies and comment letters submitted to date on the DEIS process. We also incorporate the Shoreline South East Subarea Plan, adopted by the Council in 2012

<http://www.shorelinewa.gov/index.aspx?page=178>

and the Shoreline Sustainability Strategy adopted in 2008.
http://cosweb.ci.shoreline.wa.us/uploads/attachments/pds/esc/COMPLETE_FinalSESStrategy2008July.pdf

Position on Best Alternative

C-033-002

Paramount Park Neighborhood Group recognizes (with some trepidation) that the NE 145th proposed location would likely be the best for the Lynnwood Link Station Area. We agree with the position taken by the City and some in the 145th/155th Station Citizens Committee that the 145th Station offers the best access and the best opportunity for improvements to NE 145th (St Rt 523). And though it will bring about huge changes to our immediate neighborhood, it may be less disruptive than if it were built at NE 155th.

C-033-003

However, we are extremely concerned that the DEIS states in section 4.2.6 that "no mitigation related to land use would be required during construction or operation." It seems obvious to us that when you have a huge project plowing through an entirely single-family neighborhood, there would naturally have to be an "adverse impact" which needs to be mitigated.

Recommendation — We recommend that the project administrators look for ways to specifically address all negative impacts whether perceived or tangible and mitigate them.

C-033-001

There is no "party of record" designation for the environmental review process. Janet Way, member of the Paramount Park Neighborhood Group, has been added to the Lynnwood Link Extension project email update list.

The Draft EIS identified specific impacts due to each of the alternatives in various elements of the environment, and also described potential mitigation measures. High levels of adverse impacts in the areas of concern listed would not result with the proposed project design and the incorporation of best practices and mitigation measures. The project would not result in additional flooding, and in several areas would address existing problems for stormwater treatment and retention. Worsened congestion and safety are also not anticipated, and in a number of cases would involve improvements compared to No Build. Sound Transit is not proposing changes in zoning or densities in surrounding neighborhoods, although the potential for local jurisdictions to consider changes is evaluated as an indirect impact.

For impacts and proposed mitigation associated with traffic congestion and safety, please see Chapter 3 Transportation. See Chapter 4 Environmental Impacts and Mitigation for impacts and proposed mitigation associated with housing density changes as an indirect potential impact (Section 4.2 Land Use); water quality and quantity, including flooding (Section 4.9 Water Resources); tax base and property values (Section 4.3 Economics); air pollution and carbon impacts (Section 4.6 Air Quality and Greenhouse Gases); noise (Section 4.7 Noise and Vibration); glare, scenic and aesthetic values, including trees (Section 4.5 Visual and Aesthetic Resources); and loss of wildlife and habitat, including tree loss (Section 4.8 Ecosystem Resources).

C-033-002

Your preference for the 145th Street Station location is noted.

C-033-004

1) **Noise -**

Elevated Rail has been shown to be a major problem for noise and vibration pollution for nearby communities which have already experienced Light Rail projects. The DEIS admits in section 4.3.4 that there will be "Indirect or Secondary Impacts" which could bring "Disruptive noise levels" potentially from elevated transit that could impact communities economically. But we do not agree that these are "indirect impacts." These would be more accurately labeled as "Direct Impacts." They could result in health or safety problems for residents and property value reductions in adjacent areas.

***Recommendation** – Noise and vibration must be addressed to reduce impacts that could negatively damage and degrade the community as they have in other neighborhoods where Light Rail has been established. More studies should be done to develop technology that will reduce the noise and vibrations. It seems to us that noise and vibration generated from Elevated Transit would be a "Direct Impact", and should be mitigated by tree planting, walls or berms to eliminate negative blows to community well-being.*

2) **Traffic and Parking –**

C-033-005

State Rt 523 is a major highway and traffic connection between Shoreline, Seattle, Lake Forest Park and cities on the "Eastside" and Interstate 5 and Aurora Ave N (Hwy 99). It is a major alternative route for commuters and community users who avoid the tolling on the 520 Bridge. Many sensitive single-family neighborhoods lie just to the north of this route within the half-mile station area. This stretch of road is currently very congested during rush hours and experiences many vehicle collisions and other safety problems.

It is also a major Metro Transit route which could provide access to the Light Rail station and provide alternatives to single automobile trips, but only if the narrow highway is improved and retrofitted. This route also poses major safety problems for pedestrians and bicycle riders, but which could also offer improved use and safety if it were widened and improved.

Currently this route is also a major source of noise and air pollution.

Without mitigation and major improvements for this route the 145th Station Area would not be successful. The problems cited above must be addressed in order to provide a truly walkable Station Area for Light Rail.

We are also very concerned that the City of Shoreline and City of Seattle and their taxpayers will be left with the economic burden of upgrading and retrofitting all of the roads and other infrastructure that will be necessary to integrate and connect this

C-033-003

No mitigation is presented under the discussion of land use because the light rail project would support long-range planning and growth management policies and goals as stated in Section 4.2. The Lynnwood Link Extension project is consistent with the City of Shoreline 2012 *Comprehensive Plan*. The discussion of land use impacts in Section 4.2.2 also acknowledges other related long-term and construction impacts to the neighborhood in the introductory paragraphs of Section 4.2. Please see the discussion of impacts and proposed mitigation in the following sections: Chapter 3 Transportation; Section 4.1 Acquisition, Displacements, and Relocations; Section 4.4 Social Impacts, Community Facilities, and Neighborhoods; Section 4.5 Visual and Aesthetic Resources; Section 4.6 Air Quality and Greenhouse Gases; Section 4.7 Noise and Vibration; and Section 4.17 Parks and Recreation Resources.

C-033-004

It is Sound Transit's policy to mitigate light rail transit noise and vibration impacts that would otherwise result in moderate or severe impacts, consistent with published FTA guidance. See Section 4.7 of the Final EIS for updated direct impact and mitigation information for noise and vibration. Noise walls are planned for all alternatives in this area, either at-grade or elevated, as mitigation for the light rail impacts.

The discussion of noise as a potential indirect economic impact in Section 4.3.4 was in the context of a review of combined effects of the project in ways that could reduce economic or business activity; with mitigation of the direct noise, traffic, property and other related impacts, the section describes a low potential for adverse economic impacts, and a good potential for positive economic effects.

Tree replacements and replanting are being considered for mitigation for visual impacts, and both WSDOT and local jurisdictions have tree or

C-033-005 | Light Rail service to our community. Our taxpayers are already paying a great deal of revenue into this system with little benefit thus far.

***Recommendation** – Follow through with studies on how to retrofit Rt 523 to accept the traffic, transit stops, widen sidewalks, add bike lanes, and pedestrian crossings, potentially with a traffic light, mitigate noise and air pollution and radically improve safety to improve access for the public to utilize the Light Rail Station to the maximum extent.*

C-033-006 | **3) Walkability, Bicycle and Transit Impacts** –
There are many opportunities to improve walkability and public safety and quality of life that could easily be implemented in the Ridgecrest neighborhood with the Light Rail project.

Paramount Park Open Space and Jackson Park contain excellent trail opportunities that are currently, already used by bike and pedestrian commuters. But the existing trail on 148th across Little Creek experiences wash-outs nearly every year. The undersized culvert there needs to be replaced with a “box culvert.” The replacement of this culvert would serve several purposes, improving stream function and enhancing the trail for safety.

C-033-007 | Light Rail should not displace bus ridership, but it should be designed to be coordinated and build transit of all forms.

Circulator buses should be provided for cross-town to bring riders from all parts of Shoreline and North Seattle, especially from schools and Shoreline Community College. There should also be improved opportunities for handicapped access to sidewalks and transit, with increased usage of handicapped access vans. The DEIS mentions little about serving this community.

C-033-008 | Development of light rail should not be an excuse to put tolling in place on I-5 to increase revenues. This would only decrease support for Light Rail ultimately and not increase likelihood of success.

C-033-009 | ***Recommendation** –we suggest that planners refer to the SE Subarea Planning documents for ideas on how to improve pedestrian safety throughout this older neighborhood. Particularly, attention should be paid to connections between Jackson Park, Paramount Park Open Space and 15th Ave NE. Sidewalks and LID projects should be deployed to improve drainage as well as walkability. Bike lanes and biking facilities should be developed at the Light Rail station area, with bike lockers and storage.*

C-033-010 | **4) We believe that the stormwater runoff is not being adequately addressed, and negative impacts to Thornton Creek will be adverse.**

Light Rail **cannot** be built to Shoreline along the I-5 corridor without impacting

vegetation replacement requirements that will apply to the project, but vegetation offers limited noise abatement value.

C-033-005

Table 3-26 in the Draft EIS identified where mitigation would be needed to address the project's impacts near the NE 145th Street Station, including due to additional traffic using NE 145th Street (SR 523) to access the station and/or park-and-ride garage. This information has been updated in Table 3-27 of the Final EIS. Other features of the project, including for station area improvements for transit, pedestrians, and bicyclists, have been identified through further planning for the Preferred Alternative; please see section 2.5 of the Final EIS for more details. Sound Transit is not required to improve existing deficiencies in areas that are not adversely affected by the project. In a separate effort, the City of Shoreline, in coordination with Sound Transit and WSDOT, is conducting a study to review potential improvements along NE 145th Street, including at the NE 145th Street and I-5 interchange, to improve traffic operations, connections and safety for all modes in the area.

C-033-006

The project is being designed to encourage the use of walking and biking to reach the station and connect to the surrounding communities. Streets and station areas reconstructed as part of the project will accommodate pedestrians and bicyclists consistent with applicable city standards and plans. Sound Transit is aware of the community's interest in enhancements at Paramount Park and the open space, and the agency has included these areas in a planning review of potential candidate sites for natural resource mitigation, but site requirements would depend on the permitting requirements for the project to be built. As the project enters final design and permitting, Sound Transit will continue to coordinate with the City of Shoreline and other permitting agencies to finalize the project's approach to meeting permitting requirements.

C-033-010

Thornton Creek and its associated wetlands. This is just a reality. Interstate 5 was built in the middle of an extensive wetland system. The remnants of that system remain alongside the freeway. There is a significant wetland at 148th and the Freeway. It is mapped. There are wetlands quite obviously associated with the creek corridor along Fifth Ave and at Twin Ponds area (Peverly Pond at Aegis is another example). While these wetlands are somewhat degraded, but continue to be important headwaters wetlands for Thornton Creek and must be protected!

C-033-011

Thornton Creek is the largest watershed in Seattle and Shoreline. The creek runs under I-5 and has a major tributary, Little Creek running under NE 145th. Little Creek at Paramount Park Open Space is associated with largest wetland system in Shoreline. Over 40 bird species have been observed in Paramount Park, including Pileated Woodpecker, Raptors (Bald Eagle, Sharp-shinned Hawk, Red-tailed Hawk, Peregrine Falcon), Great Blue Heron, and Band-tailed Pigeon. Thornton Creek is critical habitat for five species of salmonids, including Chinook and Steelhead (a steelhead was observed in a reach of Thornton Creek, just north of NE 155th St in 2004. It was confirmed by three biologists from several governing authorities, including WDFW). There are also sensitive wetlands associated with the creek corridor, which are constrained next to Fifth Ave NE in the path of the Lynnwood Link route.

The DEIS failed to study the upstream areas or the overall, cumulative impacts of Elevated or At Grade Light Rail Tracks and Station areas on wildlife habitat.

Other Critical Areas and stream systems are mentioned in the DEIS, including McAleer Creek. It well known to contain important salmonid populations.

All the creeks in the study area are distressed due to impacts from stormwater inundation. LID technologies utilizing natural drainage systems, swales, native plantings and should be used to retrofit existing drainage along with this project development.

Recommendation – We request that more study and LID methods be detailed and deployed to find ways to retrofit Thornton Creek where the Lynnwood Link intersects with it and also mitigate the damages by providing more quality open space and improvements for Little Creek to enhance pedestrian and bike usage and water quality and wildlife habitat. The culvert under I-5 should be retrofitted for improved fish passage. There are existing technologies that can do this with a minimal effort. The mistakes of the past in Thornton Creek need not be perpetuated by our State, regional and local governments. Salmon will return if fish passage is improved to allow return to existing wildlife habitat upstream. Salmon recovery is a goal of every governing body that is charged with completing a Light Rail system. It should not just be a lofty goal, but an achievable objective.

5) Open Space and Parks –

C-033-007

Sound Transit coordinated with King County Metro and Community Transit on initial assumptions on bus service to the stations, but decisions on final service levels and routes would be defined through a public planning process occurring closer to system opening. The conceptual service plan assumes higher levels of feeder service to the station along east-west arterials, but also includes north-south connections. Service on some current routes that duplicate the project's proposed service and major regional connections could be redirected by Metro because riders are likely to prefer the faster, more frequent and reliable service offered by light rail. As described in Section 2.3 of the Final EIS, all stations would be accessible as required under the Americans with Disabilities Act (ADA), and would include pedestrian and bicycle access to and from feeder bus lines, park-and-ride facilities, and surrounding streets. They would be designed to satisfy all applicable public access, and life safety requirements. As described in Section 3.2.5 of the Final EIS, Sound Transit would continue to develop the project's pedestrian and bicycle improvements at Lynnwood Link Extension stations consistent with its current System Access Policy.

C-033-008

Tolling I-5 is not a component of the Lynnwood Link Extension project. Tolling I-5 would be a decision of the Washington State Legislature and wholly independent of this project.

C-033-009

Currently, the project is assuming that all streets reconstructed with the project will be built to current standards for bicycle and pedestrian facilities. The station sites will also accommodate pedestrian and bicycle connections, and will include areas for bike parking and storage. Several of the streets being rebuilt in station areas include bike lanes, as called for in City of Seattle and City of Shoreline transportation and bicycle plans. Improvements to other areas not altered or adversely

C-033-012

With increased density, more Open Space is a crucial element of successful communities and walkability, and one that is called for the Shoreline Comprehensive Plan. Protecting critical habitat is also a necessity in order to protect our water and air quality.

There are several important parks that are in the Station Area that should be enhanced and retrofitted for the expanded use that should naturally come from increased density and walkability desired by planners and citizens anticipating the Lynnwood Link Light Rail project.

However, it is a major oversight in the DEIS that many important parks, open space and environmental assets are NOT EVEN MENTIONED! For instance, in Section 4.17.1, Jackson Park and Twin Ponds Park are discussed, but Thornton Creek (the largest creek system in both Shoreline and Seattle) is not mentioned! Neither is Paramount Park Open Space, which offers major commuter trail and recreational trail routes and contains the largest wetland in Shoreline and a vital tributary, Little Creek. Paramount Park Open Space is within a .5 mile of the Light Rail route, but it is not included in Open Space analysis. This is not acceptable.

C-033-013

Paramount Park Open Space and Jackson Park are the closest parks to the 145th Alternatives. These two parks should have a natural connection at Eleventh Ave NE, both for the community and for wildlife. Both have very important pedestrian access components and needs for improvements. Also, there are several other parks nearby. Paramount School Park is an important recreational asset, with the Skateboard facility and Ridgecrest Park has handball courts and ball fields that are valued by a segment of the citizenry. Also, Twin Ponds Park has a significant section of the North Branch of Thornton Creek running through it.

A traffic light and crosswalk should be installed at Eleventh NE or Tenth NE to allow for safe pedestrian crossing and an alternate entrance to Paramount Park Open Space. The City has considered purchasing the "Jackson Plateau" property there, as an addition to Paramount Park Open Space, since a development of a cul de sac project there failed. It has been listed on the Shoreline "Pro Parks" plan as a possible acquisition. It is a natural wildlife corridor, which could connect these two assets for recreation and walkability in the Seattle and Shoreline neighborhoods of the station area.

Paramount Park also needs a great deal of work on trail improvements. A "box culvert" should be installed at 148th to better contain flooding in Paramount Park. And the culvert for Little Creek under NE 145th must be replaced to restore fish passage. These are all relatively inexpensive improvements that need to be addressed to provide walkability and mitigate damage to the Thornton Creek Watershed, which Light Rail will inevitably affect.

affected by the project are not proposed. Sound Transit will continue to work with local jurisdictions to finalize the projects' station access plans, consistent with Sound Transit's System Access Policy.

C-033-010

Sound Transit recognizes the importance of Thornton Creek and its associated wetlands, and the agency has conducted initial mitigation and permitting planning for the project that considers opportunities for mitigation sites within the Thornton Creek watershed. Federal, state, and local regulations may require Sound Transit to mitigate impacts on wetlands and buffers using an approved mitigation bank (if available in the future), King County in-lieu fee program, or project-specific mitigation developed by Sound Transit. If project-specific mitigation is developed for this project, site selection would emphasize a watershed approach. Section 4.8 of the Draft EIS describes resources and potential impacts and proposed mitigation.

C-033-011

Sound Transit's Ecosystems Technical Report accompanied the DEIS and provided greater detail on resources in the project area. The technical report, now updated for the Final EIS, also describes the study area and the methods used to identify areas likely to be affected by the project construction and operation. During scoping for the EIS, the project's proposed analytical methods were reviewed by a variety of agencies with jurisdiction and natural resource expertise. The analysis of ecosystems impacts, including impacts to fisheries and wildlife habitat, was conducted and coordinated with the water resources analysis discussed in section 4.9. Finally, further information has been developed for a Biological Assessment in conjunction with Endangered Species Act compliance; see Appendix O of the Final EIS. Sound Transit policy requires all projects to consider low-impact development (LID) methods as a first choice for stormwater treatment. The project will review the feasibility of LID strategies as part of the project design, in conjunction

C-033-013 | ***Recommendation** – Follow up with studies and implementation to improve open space access and walkability in the immediate neighborhood. Review and reanalyze impacts to environmental assets in local parks and how the Lynnwood Link might affect them. Include Paramount Park Open Space and Thornton Creek in this analysis. Consider improvements to these assets as mitigation for needed improvements to walkability and bicycle commuting.*

C-033-014 | **6) Neighborhood–**

If the Lynnwood Link is to be built, there will undoubtedly be many changes to our quiet, single-family neighborhood. These changes must be carefully implemented and properties that are affected must be adequately compensated and transitions to single-family neighborhoods must be gradual and carefully planned. Quality community design elements must be included to improve walkability and preserve quality of life.

***Recommendation** – Use the recommendations in the Southeast Subarea Planning Effort completed in 2012 to improve the neighborhood when Light Rail is implemented.*

C-033-015 | **7) Air Pollution and Carbon Footprint –**

We are concerned about what the true “carbon footprint” impacts of this project would actually be. Considering the likely possible tree losses in the route of the rail line between Northgate and through Shoreline and carbon footprint of the massive amounts of concrete which would be utilized for construction of elevated pilings, parking garages, plazas, and station areas, we question the actual calculation and ultimate value in the region’s investment in the Lynnwood Link.

C-033-016 | There are literally thousands of valuable mature trees of many varieties along the proposed route. These trees are now providing excellent services mitigating the air pollution, shading, wildlife habitat and stormwater runoff in the corridor from freeway traffic and vehicle pollutants. The corridor and associated development proposed for the elevated structure for the Lynnwood Link would most likely destroy most of those trees. There must be mitigation included which would provide a 3-1 replacement value for those trees particularly the “native” conifers which offer the most in environmental services.

C-033-017 | Also we are concerned about additional traffic congestion, which will undoubtedly result from this project in the immediate and nearby neighborhoods and the pollutants that will be generated. How will those impacts be mitigated? The answer cannot be that no parking will be provided for the passengers of Light Rail, otherwise ridership will be inadequate to justify the entire project.

with project permitting. Sound Transit would minimize the potential for interference with possible future fish habitat restoration projects from construction of the light rail alternatives by designing and locating project features to avoid Thornton Creek.

C-033-012

As described in Section 4.17 of the Draft EIS, parks, recreational resources, and open spaces located more than 0.25 mile from station locations or 300 feet from light rail tracks would not experience direct impacts from the project. Paramount Park is outside the general study area used for parks (see Figure 4.17-1), and there were no environmental topic areas that identified adverse effects extending beyond that distance. Based on the Draft EIS analysis and the updated Final EIS findings, a station at NE 145th Street would not result in adverse direct or indirect impacts to any designated open spaces associated with Thornton Creek (Park #1 was identified in Table 4-17-1). Impacts to Jackson Park would be primarily visual. Therefore, no mitigation at those parks is proposed except to address visual impacts at Jackson Park. Potential changes in allowable density would be an action taken by local jurisdictions, if at all, and not by Sound Transit, but are discussed in the indirect impacts section in each environmental topic area. The potential impacts and any mitigation due to increased density would be considered during the planning and environmental review for any comprehensive plan changes by the local jurisdictions, as well as for the local approvals for potential developments by others.

Potential impacts to Thornton Creek are discussed in Section 4.8 of the Draft EIS, Ecosystem Resources.

C-033-013

Please see response for comment C-033-012.

C-033-018

Recommendation –

We request that the maximum number of trees should be retained whenever feasible, and any that are cut should be replaced on site or nearby with a 3-1 ratio, preferably with conifers and native species. The carbon generation should be offset with solar and other renewable technologies in the development of the station area.

C-033-019

C-033-020

8) Light Rail Station Area Planning –

The Light Rail Station area should be a major center for community connection, architecturally attractive and economic improvement and not just an expensive, huge concrete mausoleum for parking and a reason to cut a huge number of trees that have grown up to screen our neighborhoods from I-5 over the last 50 years.

We believe it should include opportunities for retail establishments, which can provide useful services to commuters and local residents. Restaurants and other service providers should be included. Lighting and glare should be considered and designs should provide technologies to save energy and shield surrounding communities from their impacts. Signage should be attractive but not dominant.

Recommendation –

We recommend maximum usage of green technologies in the construction of these buildings and additions of community assets such as opportunities for smart cars sharing, bike share, bike lockers, adequate parking to increase ridership, numerous transit connections, meeting rooms, plazas with eating areas, shading, native landscaping, artistic and decorative design which reflect the Northwest culture.

We look forward to working with the Sound Transit Board and all the entities that will be doing the implementation of this planning effort.

Thank you for your consideration.

Respectfully submitted,

C-033-014

The Draft EIS acknowledged that construction of the station, parking garage, and other facilities would alter the visual characteristics between the highway and the adjacent single-family residential neighborhood, and would also remove several single family homes at the edge of the neighborhood. After mitigation and improvements to address traffic and circulation needs, other direct changes to the neighborhood would be limited. For a more detailed discussion of visual impacts and mitigation, see Sections 4.5.2 and 4.5.7, respectively. Other sections found low to moderate effects for a station adjacent to I-5 at an existing freeway interchange and at the intersection of two major arterials. For additional information refer to Section 4.4 - Social Impacts, Community Facilities, and Neighborhoods in the Final EIS.

Longer-term changes in the neighborhood could occur if local jurisdictions amend plans governing allowable uses of properties adjacent to the light rail transit station. These would be local decisions made by local jurisdictions, and are not proposed by Sound Transit. Section 4.2.4 discussed the potential for impacts due to land use changes by local jurisdictions.

The project also includes amenities and improvements such as bike facilities on rebuilt sections of 5th Avenue NE and improved sidewalks in the station area.

C-033-015

During final design, Sound Transit would consider opportunities to plant trees, consistent with the sustainability policy, which recognizes the benefits tree plantings would have; plantings are also likely to be a condition under various permits required for the project. Please refer to the visual and ecosystems sections for more details on specific mitigation commitments that would include replacement plantings.

Janet Way, President
Paramount Park Neighborhood Group

The Draft EIS estimated the greenhouse gas emissions during construction by using several sources, including information based on the agency's own projects that are similar in scale and construction methods to the Lynnwood Link Extension. Producing and disposing of materials needed to build the project will also produce greenhouse gas emissions, which would be an indirect effect of the project. However, at this time, there is no standardized methodology for calculating the embodied and lifecycle emissions from transportation projects.

C-033-016

Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on ecosystem mitigation is to avoid impacts on environmentally sensitive resources to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects. Sound Transit will comply with all applicable tree protection standards in local jurisdiction codes.

C-033-017

Mitigation measures for any impacts from traffic congestion as a result of traffic accessing a station or park and ride will be included as part of the project. No adverse air quality impacts are expected. Analysis of potential air quality impacts is provided in Section 4.6 of the Draft EIS.

C-033-018

Please see response to C-033-016.

C-033-019

Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on petroleum conservation and renewable fuel and energy is to work with energy providers to maximize the percentage of renewable energy purchased.

Sound Transit's approach to incorporating sustainability opportunities into its facilities is summarized in Section 2.6 of the Draft EIS.

C-033-020

The project does not propose specific other uses such as retail, but Sound Transit policy encourages potential partnerships for transit-oriented developments (TOD). Sound Transit's TOD and Sustainability Policies will continue to be applied during final design. See Section 4.5 for visual impacts and mitigation.